Distance learning challenges the academic work of colleges and universities as well as the politics of self-regulation. This, in turn, places significant responsibility on the accrediting community in two ways. First, accreditors must take the initiative in defining the differences in teaching and learning that distance learning brings in order to sustain the quality of the higher education experience. Distance-based teaching and learning must respond to similar expectations of quality that are comparable, even if they are not identical, to the expectations that have such a long and respected tradition in the site-based community. Attention to student achievement is central to these efforts. Second, accreditors must attend to the bond of trust that has been created with government, that in exchange for assurance about quality through voluntary accreditation, government honors the principle of self-regulation and institutional autonomy. This needs to be accompanied by attending to the public's growing demand for reliable information about quality. The five responsibilities for institutions and accreditors outlined in this essay can go a long way toward meeting the challenge of distance learning to both the nature of academic work and the politics of institutional self-regulation. (Contains 34 references.) (SLD)
Distance Learning: Academic and Political Challenges for Higher Education Accreditation

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SUMMARY

Distance learning challenges the academic work of colleges and universities as well as the politics of institutional self-regulation. This, in turn, places significant responsibility on the accrediting community in two ways. First, accreditors must take the initiative in defining the differences in teaching and learning that distance learning brings—in order to sustain the quality of the higher education experience. Distance-based teaching and learning must respond to similar expectations of quality that are comparable, even if they are not identical, to the expectations that have such a long and respected tradition in the site-based community. Attention to student achievement is central to these efforts. Second, accreditors must attend to the bond of trust that has been created with government: In exchange for assurance about quality through voluntary accreditation, government honors the principle of self-regulation and institutional autonomy. This needs to be accompanied by attending to the public’s growing demand for reliable information about quality. The five responsibilities suggested here for institutions and accreditors can go a long way toward meeting the challenge of distance learning to both the nature of academic work and the politics of institutional self-regulation.
Distance Learning: Academic and Political Challenges for Higher Education Accreditation

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A previous essay in this series (Core Academic Values, Quality and Regional Accreditation: The Challenge of Distance Learning) explored the challenges posed by distance learning to certain values of higher education and examined the implications of these challenges for accreditation. In the essay that follows, the focus is on how distance learning challenges some fundamentals of the academic work and the politics of American higher education—thereby challenging some related features of quality assurance and self-regulation that are at the heart of national, regional and specialized accreditation. Accreditors, whose first and foremost task is to examine how higher education operates, must take responsibility for examining these challenges and the variations distance learning introduces into higher education operation. Only if accreditors take such responsibility can they remain credible and continue to play their vital role in protecting the independence of higher education through self-regulation.

Whether the emergence of distance learning spells the end of traditional campuses, as some maintain, or whether distance learning instead represents a particularly powerful addition to a growing array of delivery options for higher education, the fact remains that distance learning is already having a very real impact on higher education operation. Distance learning is creating alternative models of teaching and learning, new job descriptions for faculty, and new types of providers of higher education. Virtual programs are being offered on brick and mortar campuses, computer-mediated instruction is being provided in traditional lecture halls, and web-based catalogs and electronically delivered transcripts abound in counseling offices.

Section I

WHAT DO WE KNOW ABOUT THE IMPACT OF DISTANCE LEARNING ON HIGHER EDUCATION?*

The first and most familiar impact is the growth of credit-bearing distance learning offerings and enrollments at accredited, degree-granting colleges and universities.

* "Distance learning" as used here refers to the application of electronic technology to teaching and learning. Some definitions of distance learning include any kind of education activity in which students are separated from faculty members and peers. The primary new challenges for accreditation, however, stem from technology-based distance learning and its implications for the traditional academic and political operation of higher education.
The second is the appearance of "new providers" of higher education: freestanding online institutions, higher education online consortia (degree-granting and nondegree-granting), corporate universities, and unaffiliated online providers of courses and programs. These new providers sometimes join forces with long-established, degree-granting colleges or universities and other organizations such as libraries and civic groups. The third is the emergence of partnerships between institutions and the corporate sector for the provision of online services to support distance learning (for example, services that provide information to students, assist with registration or transfer and provide access to student support). Such partnerships turn familiar college and university functions into online transactions.

The growth of distance learning has an international dimension as well, since countries around the world are using distance learning technologies to enlarge their own course, program, and degree offerings and to import and export education programs and services. Countries such as India and South Africa are heavy importers of distance learning programs as they seek to expand educational opportunities for their own citizens. China, Thailand and Japan employ distance learning technologies to develop their own programs and degrees, bolstering their existing higher education systems. Western and Eastern European countries are struggling to determine what place, if any, distance learning providers have alongside their traditional education providers. The United States, Australia and the United Kingdom are major exporters of higher education through electronic technology.

Some of these changes in the higher education landscape are described in more detail below.

**Degree-granting institutions and Distance Learning**

During the academic year 1997–98, approximately 1.6 million students were enrolled in credit-bearing distance learning courses (whether electronic, television-based, or print- and-mail-based, and including both synchronous and asynchronous instruction) in degree-granting postsecondary colleges and universities in the United States. That year, 54,000 college-level, credit-bearing distance learning courses were offered in 1,680 institutions (United States Department of Education, 1999). Thirty-five states currently operate virtual universities or participate in a regional virtual university, typically created by existing degree-granting colleges and universities (State Higher Education Executive Officers, 1998). Dun and Bradstreet estimates that institutions offering distance learning programs have doubled in the past year and that 87 percent
of institutions offer Internet access and campus websites (University Continuing Education Association, 2000).

Large public universities such as the University of Maryland University College (UMUC) are especially active in distance learning, providing distance learning opportunities on a global scale. UMUC offers courses in 30 countries around the world; in 1999-2000, UMUC had more than 40,000 online student enrollments (Heeger, 2000). Other universities are rapidly expanding online enrollments. The University of Wisconsin enrolled more than 5,000 students in online offerings in 1999-2000, up from just under 2,200 in 1998-99 (Oakley, 2000). The Pennsylvania State University World Campus enrolled 3,000 students online in 1999-2000, three times the enrollment of the prior year (Prentice, 2000).

To encourage and accommodate these enrollments, established degree-granting institutions are creating electronic academic capacity with distance learning portals (broad Internet gateways) and platforms (software capacity to offer online courses, whether commercially prepared or developed by institutional faculty). Colleges and universities are entering into service agreements that enable faculty to deliver online courses and enable students to obtain access to those courses. Among the companies offering such services are Blackboard.com, a provider of web-based platforms for course development, and Hungry Minds, an aggregator of online sites (Hatlestad, 2000). A body of faculty development literature is emerging, in print and online, to help faculty learn how to create virtual classrooms and meet the challenges of quality online teaching and learning.

Finally, some degree-granting institutions have moved quickly to create for-profit subsidiaries in response to the interest in distance learning. Cornell, Columbia, New York University, Temple University and the UMUC are sustaining for-profit operations to offer online courses (Carr, 2000).

How can we put the growth of distance learning in perspective? It is true that, with more than 5,000 postsecondary institutions in the United States, the 1.6 million students taking distance learning credit-bearing courses amount to just a few students per institution. Even 54,000 distance learning courses may not represent a major shift when spread over thousands of institutions. Nonetheless, the speed with which the growth in distance learning has taken place suggests that the technology is very seductive and on its way to becoming more pervasive. And as important as enrollments and numbers of courses may be in gauging the impact of distance learning, it is also significant that so many of the institutions and programs that are adopting distance learning practices are among the most well-established and highly regarded in the country.

**New Providers and Distance Learning**

The "new providers" of distance learning represent a diverse assortment of higher education options. They include new stand-alone, degree-granting online institutions; degree-granting online consortia (groups of degree-granting institutions that offer
courses online, with degrees granted by the consortium itself rather than any of the participating colleges and universities); nondegree-granting online consortia (where degree authority is retained at the institutional level); corporate universities; and online programs and courses that are not affiliated with institutions and may or may not offer degrees or other credentials. This sometimes bewildering array of providers is complicated by the aggressive and growing presence of the for-profit sector in its midst.

New Stand-alone, Degree-granting Online Institutions

During the last eight years, a small number of high-profile new providers of distance learning—sometimes called “virtual universities”—have emerged: degree-granting nonprofit institutions such as Western Governors University and the United States Open University. These institutions are joined by new for-profit degree-granting distance learning providers such as Jones International University and the University of Phoenix Online Campus—also high-profile institutions.

The for-profit institutions, in particular, reflect the investment community’s growing interest in higher education and its increased willingness to channel venture capital into higher education enterprises. Other examples of for-profit distance learning providers include Michael Milken’s and Larry Ellison’s Knowledge Universe, a conglomerate of education and training initiatives that also provides support for new ventures (Michaels and Smillie, 2000), and Harcourt Learning Direct, a for-profit university established by Harcourt General, a division of Harcourt Brace, that is offering courses and degrees online as of fall 2000 (Blumenstyk, 1999).

Degree-granting Online Consortia

Degree-granting consortia may be for-profit or not-for-profit. UNext Cardean, a for-profit degree-granting consortium, brings together the University of Chicago School of Business, Carnegie Mellon University, the London School of Economics and Political Science, Stanford University and Columbia Business School. Faculty from these institutions provide course content for Cardean offerings, and Cardean will award degrees. The focus is business education at the graduate level, using problem-based learning as a primary strategy. The initial target audience is employees of global corporations (McCormick, 2000).

National Technological University (NTU), established in 1984, is a nonprofit consortium, degree-granting engineering school that is made up of an alliance of more
than 50 universities. NTU is a private graduate institution enrolling approximately 1,400 students.

Nondegree-granting Online Consortia
Networks of degree-granting institutions from which students may select a range of courses and programs are yet another kind of new provider. The Southern Regional Education Board's (SREB's) Electronic Campus, created in 1998, offers a directory of 3,200 online courses and 102 degree programs offered through 262 institutions from 16 states (Carnevale, May 19, 2000). SREB itself does not offer degrees; these remain the province of participating institutions. SREB is a model for many other cooperative arrangements to provide access to education online. JesuitNET, a distance education network of 24 Jesuit colleges and universities, is one example. It will begin offering online courses from its institutions in fall 2000. The network will act as a web portal as well, and member institutions will also pursue cooperative course development (McMurtrie, 2000).

Fathom, an example of a for-profit, nondegree-granting consortium, is emerging from a partnership among Columbia University, the British Library, the Cambridge University Press, the London School of Economics and Political Science, the New York Public Library and the Smithsonian Institution's National Museum of Natural History (Carr and Kiernan, 2000). By the end of 2000, Fathom expects to offer 7,000 online undergraduate and graduate courses (Michaels and Smillie, 2000).

Corporate Universities
There are at least 1,000 and perhaps as many as 1,600 companies that maintain private teaching and training enterprises (Saba, 1999). Many of these corporate universities are still site-based but are moving quickly to online modes of operation. They include, for example, Dow Jones University, Hamburger University and Cox University. Companies such as Microsoft, Novell, Oracle and Cisco also have emerged as primary providers of online information technology training and certification. An estimated 2.4 million individuals worldwide are expected to earn such certificates in 2000 (Adelman, 2000).

Unaffiliated Online Programs and Courses
The number of online courses and programs that are not affiliated with any institution is estimated at anywhere from 100,000 to 1 million, depending on whether we are talking about credit-bearing educational activities or single-instance noncredit offerings (e.g., a four-hour seminar online). Kaplan Inc., for example, has launched KaplanCollege.com, a collection of 500 online courses across nine professions (Michaels and Smillie, 2000). Merrill-Lynch estimates that the online higher education market will grow to $7 billion by 2003 (Moe and Blodget, 2000).

Virtual institutions, new for-profit providers fueled by venture capital, degree-granting and nondegree-granting online consortia of degree-granting institutions,
corporate universities, unaffiliated online courses and programs—the speed at which these new providers are proliferating is genuinely startling. Entrepreneurial providers can launch degree programs in a matter of weeks, not years.

**Partnerships for Online Services and Distance Learning**

A diverse array of partnerships between degree-granting institutions and corporations is emerging to provide online services in support of distance learning. The emergence of these partnerships is a product of the availability of electronic distribution services, the growth in the number of content providers, and the relentless expansion of communications capacity. Typically, they involve degree-granting institutions turning to corporations for technology that adapts existing and familiar institutional support operations to an online environment.

Here are but a few examples.

- Oklahoma Christian University and Netplex have signed an agreement for “e-Campus,” technology which will handle electronic transactions and develop personalized websites for students, parents, faculty, staff, alumni and donors. Texas A&M and MessagingDirect are working together to provide students with financial information online (such as electronic statements for debit cards) and, ultimately, to permit electronic billing of tuition (*The Chronicle of Higher Education*, April 13, 2000).

- Regents College in New York and Johns Hopkins University are creating the Regents College Virtual Library—an online service to students (Carnevale, April 21, 2000). Bowdoin College and Harris Internet Service are working together to develop online communities for college alumni. Other examples include web-based interactive foreign language education provided by California State University and Telete Education Ltd. AT&T and five universities have created the Education Alliance, a project designed to build student skills at networking and using information technologies (Ludwig, 2000).

These partnerships for online services are another feature of the changing landscape of higher education. They reflect an expanding and diversifying relationship between the nonprofit education community and the for-profit business world. Higher education and business are sharing resources and pursuing common goals in the area of online service provision as well as in offering online courses, programs and degrees.

To be sure, these partnerships are viewed by some with consternation and concern. The subject is part of a larger debate in this country about whether there is an unbridgeable gap between the values of for-profit enterprises and those of nonprofit institutions when it comes to providing education. Will the keen interest in revenues demanded by for-profit activities undermine the commitment to public service and
public good that is considered an important aspect of nonprofit higher education (and elementary and secondary education too, for that matter)? Is the profit motive compatible with higher education's traditional commitment to general education and independent intellectual inquiry? Because the rapid expansion of distance learning has often entailed cooperative initiatives with technology companies and venture capitalists, such questions—while not the primary subject of this essay—are never far removed from discussions of the impact of distance learning.

In summary, we know a good deal about the impact of distance learning on higher education. The accrediting community, like the colleges, universities and educational programs it sanctions, must scrutinize and evaluate these alterations in the higher education landscape and the new challenges they entail, which are described in the sections that follow. Our ability to design a thoughtful response to these challenges will dictate the future quality of higher education.

Section II

THE CHALLENGE OF DISTANCE LEARNING AND THE ACADEMIC WORK OF HIGHER EDUCATION

Whether pervasive or limited, offered in familiar or new provider settings, nonprofit or for-profit, distance learning is challenging the traditional academic work of colleges and universities.

Through electronic communication, remote access and virtual faculty-student relationships, distance learning goes to the heart of the higher education enterprise—teaching and learning and the classroom. Consider these key features of distance learning:

- **Computer-mediated classrooms**: faculty and students engage with each other through keyboards and monitors, relying heavily on the written word rather than face-to-face exchange;
- **Separation in time between communications**: teachers and students depend on asynchronous modes of communication, rather like e-mail exchanges; and
- **Availability of services online**: student services such as advising, counseling, mentoring and library services are integrated with the online teaching and learning environment.

Distance learning alters the traditional faculty role in higher education, diminishing face-to-face contact with students. It may also alter the fundamental intellectual tasks with which faculty members are traditionally charged. Some distance learning models,
for example, separate curriculum design from curriculum delivery, substituting standardized course content for curricula designed by individual faculty members. Similarly, distance learning can shift the responsibility for determining academic standards from faculty members to the staff of corporate or other distance learning providers; or standards may already be embedded in commercially prepared curricula. We begin to understand the scope of these differences when we learn that the University of Illinois and the University of California–Los Angeles, among others, offer courses in how to teach online—suggesting that the differences between site-based and distance-based teaching environments are complex and challenging enough to require special attention.

Distance learning alters what we mean by “higher education institution,” replacing or augmenting lecture halls with chat rooms, campuses with the World Wide Web, and communities of learning with the borderless networks of cyberspace. An “institution” no longer needs to be anchored in physical space and time; it can exist anywhere, any time—a liberating notion, in one sense, but a notion that raises important questions about whether or not the Internet can substitute for the campus as a supportive environment for creative learning.

Distance learning alters what we mean by a college degree. Electronic access encourages and supports more mobile student behavior, allowing students to attend more than one institution either serially or simultaneously, online or onsite. The degree, traditionally the culmination of a distinctive institutionally based experience, is coming to represent a different type of experience: the completion of an idiosyncratic amalgam of educational experiences selected by the student from a number of unrelated institutions and delivered by a mix of technological as well as physical means.

The academic challenges posed by distance learning, then, are profound. They speak to the fundamentals—classrooms, faculty roles, institutions, degrees. They have the potential to disrupt basic quality expectations within the academic community, throwing higher education and accreditation into disarray. Accreditors have a major role to play in preventing such disruption—and in addressing the equally profound challenges posed by distance learning to the existing relationship between the federal government and the higher education community. These challenges are discussed below.

Section III

THE CHALLENGE OF DISTANCE LEARNING AND THE POLITICS OF INSTITUTIONAL SELF-REGULATION IN HIGHER EDUCATION

Distance learning is complicating and challenging the political relationship between the higher education community and the federal government. This relationship is based on important common understandings in two areas: the determination of quality in higher education and the use of federal funds in higher education. The government accepts the principle of self-regulation in the determination of higher education quality—and the related principle of institutional autonomy—while the higher education community
undertakes to assure the government that federal higher education funds (for student aid and other purposes) are expended effectively and accountably.

How is distance learning changing these understandings and the political relationship? Until recently, most decisions by the higher education community and government about education quality and the use of federal funds were made in the context of mainly site-based education delivery. The site-based model of education was a "given." Students, whether full- or part-time, came to physical campuses and attended classes and participated in other onsite activities. Both the accountable use of student aid and other federal funds and the effectiveness of institutions in creating environments for student learning were assessed on the basis of the verifiable physical presence of students at verifiable physical locations over measurable amounts of time. We knew how federal funds were used and we knew students were learning because we could observe these things "firsthand," as it were.

By contrast, distance learning creates an electronically based environment for higher education which is not entirely and sometimes not at all dependent on physical presence and physical space. This sounds simple—merely a shift from physical space to cyberspace. But just as the application of electronic technology is having a profound effect on other sectors and issues—from retailing to intellectual property rights to health care—distance learning is powerfully affecting the foundations on which the common understanding between government and higher education was built. For both parties to this understanding, the safety and familiarity of physical site and presence is being replaced with the uncertainty and the unknown of the electronic environment.

Three issues concern the federal government as this shift is taking place: Can federal funds be accountably delivered in a distance learning environment—i.e., can fraud and abuse be avoided? (This is a concern for state governments too, which have primary responsibility for consumer protection through the licensing of private colleges and universities and through the authorization of funding for public institutions.) Can accreditation continue to be relied upon to assure quality in a distance learning environment or will alternative forms of quality review be needed? And more broadly, can the federal government remain comfortable with the principle of self-regulation in higher education as distance learning expands, or are more government controls needed? The future of the common understanding between higher education and government about quality and the use of federal funds depends on the answers to these three questions.*

*State oversight of higher education institutions is also premised on a site-based model of education. At present, a college or university must have a physical presence in a state to trigger oversight.
With respect to the safe delivery of federal funds, the government needs to be confident that the student aid dispensed in distance learning settings is going to students who actually participate in courses and programs. Government needs the cooperation of higher education to protect students from distance learning providers who would exploit their interest in higher education by offering credentialing opportunities over the Internet that are "too good to be true"—and that may involve high tuition costs to be covered, in part, by federal funds. Government needs assistance from higher education as it seeks to protect students from fly-by-night distance learning providers, who are there one day and disappear the next.

With respect to accreditation and self-regulation, government needs assurances from the accreditation community that quality in higher education can be reviewed and promoted even in the face of significant academic changes driven by distance learning, and that student aid grants and loans will purchase a quality educational experience in a distance learning environment. Government is keenly aware that distance learning is exerting pressure on the accreditation community to expand and modify its site-based model of quality and self-regulation, and is watching carefully to see how successfully institutions and accreditors respond to this challenge.

Government officials, then, have legitimate and important concerns about the impact of distance learning. We in the higher education community—whether institutional or accreditation leaders—have an obligation to acknowledge the implications of distance learning for our common understandings with government about public funding and about quality. Nurturing and, if necessary, adjusting these common understandings to prevent their disruption in a changing educational environment is essential to preserving self-regulation and institutional autonomy.

Section IV
THE RESPONSIBILITIES OF THE ACCREDITING COMMUNITY:
ACADEMIC WORK AND THE POLITICS
OF INSTITUTIONAL SELF-REGULATION

Academic Work
At present, many accreditors have chosen to assure quality within the changing academic environment of higher education by taking existing standards for site-based education and applying them to distance learning. Even where accrediting organizations have developed sets of alternative standards for distance learning, these tend to be organized according to the same categories, defined the same way—curriculum, faculty and facilities—as standards for site-based education (Roberts, 1999). One way or the other, accreditors are assuming that expectations of quality must be the same for site-based and distance providers. Embracing the new "responsibilities" described below may help accreditors play an even more energetic role in assisting
Responsibilities of the Accrediting Community
To Assist Institutions and Programs

Responsibility 1:
Identify the distinctive features of distance learning delivery, whether within traditional settings or supplied by one of the new providers.

Responsibility 2:
Modify accreditation guidelines, policy or standards to assure quality within the distinctive environment of distance delivery.

Responsibility 3:
Pay additional attention to student achievement and learning outcomes in the context of distance learning.

Responsibility 4:
Work with government to adjust current policy understandings about the use of federal funds and about quality assurance in a distance learning setting, while sustaining shared commitment to self-regulation through voluntary accreditation and preserving the autonomy of institutions.

Responsibility 5:
Assume more responsibility for addressing public interest in the quality of higher education as distance learning opportunities and providers diversify and expand.

Institutions and programs as they grapple with the academic challenges posed by the growth of distance learning.

Responsibility 1: Identify the distinctive features of distance learning delivery, whether within traditional settings or supplied by one of the new providers.
Whatever our opinions may be about distance learning and its future, there is no disputing the evidence that some elements of the distance learning experience are significantly different from a site-based educational experience. The task for institutions and accreditors is to identify and scrutinize those differences to protect quality.

Institutions and accreditors might begin the identification of distinctive features by comparing online and site-based classrooms, exploring variations in the respective roles of faculty in both settings, reviewing the support environments for students in online and site-based settings and examining the design of curriculum in both settings. As mentioned above, computer-mediated classrooms, separation in time in communication between teachers and students, and the availability of services online have already emerged as variations on the traditional classroom model. Many academic tasks that may initially appear to be the same in distance and site-based settings are, upon further scrutiny, quite different. As also mentioned earlier in this essay, curriculum development for distance learning can be quite different from that process.
in a traditional setting. Accreditors and institutions need to look for these differences in delivery and assess their impact on students.

Taking a fresh look at the learning environment is important because we need to be able to peer around the edifice of assumptions we have built about academic quality in a site-based setting. We need to approach distance learning as a new and unfamiliar form of education, asking ourselves what resources, capacities and processes are involved in distance delivery, and what student learning outcomes ought to be expected from it.

**Responsibility 2: Modify accreditation guidelines, policy or standards to assure quality within the distinctive environment of distance delivery.**

If current accreditation guidelines, policy and standards fail to address the distinctive distance learning features that have been identified, some modifications may be required. Accreditors need to be sure that their framework for examining faculty, curricula, student support services, the degree and student achievement is broad enough to ensure appropriate attention to what counts as quality teaching and learning in a distance environment. New "institutional" providers of distance learning may initially require even more attention, especially when alternative teaching and learning models are accompanied by governance and financial models that are quite different from site-based operation.

For example, guidelines, policy or standards that address faculty issues may need to redefine this term. "Faculty" has traditionally referred to individuals with a specific set of tasks: designing curricula, setting academic standards, working directly with students in a classroom setting and conducting research (in certain types of institutions). Faculty in some distance learning institutions, however, may have a different set of tasks; they may deliver curricula but not design it, or they may have shared rather than individual responsibility for curriculum design; their research responsibilities may be minimal or nonexistent. Where faculty have traditionally been charged with creating a community of learning for students, based on face-to-face contact both in and out of the classroom, faculty in some distance learning environments may not work directly with students at all. The challenge to accreditors is to rethink expectations of faculty so as to address these significant variations in the set of tasks that faculty perform.

Questions abound. Is faculty quality only possible when faculty bear the sole responsibility for curriculum development? Is the quality of faculty linked inextricably to their having a certain amount of face-to-face time with students? In fact, is faculty quality defined by a certain set of tasks, such that the elimination of any one of these tasks eliminates the possibility of quality? Accreditors can either insist that a quality faculty exists only when the distance learning environment requires a faculty role identical to that of faculty in site-based environments, or accreditors can rethink the definition of "quality faculty" and articulate new or modified expectations that are appropriate to electronic communities of learning.
Guidelines, policy or standards that address curriculum are closely related to expectations for faculty quality and may call for similar reconsideration. For most accreditors, quality standards for curriculum require that development and delivery be the responsibility of appropriately credentialed faculty members employed by specific institutions and possessing special expertise in the subject area. The challenge for accreditors is to ask under what other conditions, if any, curricula can be developed (by corporations and corporate personnel, for example) and still meet quality expectations.

A number of tools are now available to assist accreditors in this effort. They include the 1996 principles of the Western Cooperative for Educational Telecommunications (WCET) that address distance learning and the 1996 distance learning guidelines developed by the American Council on Education (ACE). The Distance Education and Training Council (DETC) has been using its own standards for distance education for 45 years. These standards originally addressed correspondence education but are now focused on electronic delivery. The American Federation of Teachers (AFT) has developed a set of principles to capture its quality expectations for credit bearing distance learning. The Council of Regional Accrediting Commissions (C-RAC) has developed new guidelines for review of distance learning offerings that will be used by the regional commissions as they think through the impact of distance learning on accreditation standards.

The Servicemembers Opportunity Colleges (SOC) has constructed draft guidelines for distance education programs. The New Zealand Universities Academic Audit Unit has developed guidelines for external quality assurance for virtual institutions. In the U.K., the Quality Assurance Agency for Higher Education has issued guidelines for assuring quality in distance learning. The Council for Higher Education Accreditation has developed a competency-based model for accreditation review with accompanying competency standards that can be applied in distance or site-based settings. AACSB—The International Association for Management Education has sought to help accreditors by identifying key quality issues in distance education (see “Additional Sources,” page 18).

Responsibility 3: Pay Additional Attention to Student Achievement and Learning Outcomes in the Context of Distance Learning

We use the term “outcomes” in relation to quality assurance in more than one way. Sometimes it refers to the results of institutional performance (e.g., number of students who graduate); sometimes it describes student achievement or learning gains (e.g., competencies that students can demonstrate); and sometimes it applies to the processes that institutions undertake to achieve a particular result (e.g., faculty development to improve student learning). For purposes of this essay, with its emphasis on the challenge to academic work and political relationships posed by distance learning, “outcomes” refers to student achievement.
Assuring quality in distance learning is likely to require more attention to student achievement than we have been providing to date. In the distance learning environment, accreditors cannot examine some of the familiar features that are routinely assumed to be the foundations of quality in site-based education (physical plants, full-time faculty, etc.). Absent the opportunity for this kind of review, accreditors will need to turn to other indicators—such as student achievement—to judge institutional and program performance. Corporate distance learning providers, such as Cisco, Oracle and Microsoft, have developed effective competency-based models for using evidence of student achievement to determine quality in information technology certification. There may be tools here that accreditors can apply to their needs.

Based on these models and their own analyses, accreditors might focus on developing the following kinds of student achievement expectations (e.g., standards, guidelines, policy) to help assure quality in distance learning:

- Expectations that encourage institutions to tie judgments about the quality of institutional performance to evidence of student achievement;
- Expectations that encourage institutions to establish expected levels of student achievement and to document how well students perform against those expectations;
- Expectations that encourage institutions to provide evidence of how they evaluate and certify student achievement; and
- Expectations that encourage institutions to invest institutional resources in practices needed to assure high levels of student achievement (CHEA, 2000).

By embracing these three responsibilities—identifying the distinctive features of distance learning, adjusting accreditation scrutiny to reflect those distinctive features and paying more attention to student learning outcomes—accreditors can respond even more effectively to the academic challenges posed by distance learning.

The Politics of Institutional Self-Regulation

The new responsibilities associated with the challenges that distance learning poses to the politics of self-regulation of higher education involves not only accreditors and institutions, but also Washington-based associations representing the interests of self-regulation before the federal government.

\* Responsibility 4: Work with government to adjust current policy understandings about the use of federal funds and about quality assurance in a distance learning setting, while sustaining shared commitment to self-regulation through voluntary accreditation and preserving the autonomy of institutions.

Institutions and accreditors need to join with government to identify those respects in which current practices regarding the use of federal funds are appropriate or not for
distance delivery environments and work together to alter policies affecting the use of federal funds if this is required to either to assure quality or because there is risk of fraud and abuse in student aid.

The Distance Education Demonstration Program authorized by the 1998 amendments to the 1965 Higher Education Act is an example of the type of cooperation that is needed. The Demonstration Program is working with institutions and consortia offering electronically based distance learning to develop effective means to provide student aid while assuring quality, emphasizing student achievement and preventing fraud and abuse. The key to success will be how the lessons learned from the Program can be translated into practices and expectations whose reliable application to distance learning will help preserve the autonomy of institutions.

Additional areas where institutions, accreditors and government can profitably work together include developing a new understanding of student aid availability in light of the impact of distance learning on:

- How courses are defined;
- How programs are defined;
- How time is measured;
- How credentials are defined;
- Documentation of student learning outcomes; and
- Student attendance and performance patterns.

Institutions, government, and accreditors can also work together to define the mix of distance learning and site-based experiences that federal money will support.

* New federal regulation of higher education can be avoided, in all likelihood, if institutions and accreditors communicate effectively with government to confirm that the adjustments they make in their practices, standards and review processes constitute a rich and reliable capacity to assure quality in distance learning.

**Responsibility 5: Assume more responsibility for addressing public interest in the quality of higher education as distance learning opportunities and providers diversify and expand.**

Although many "new" providers of higher education may choose to remain unaccredited, the accrediting community—including not only accreditors but also accredited colleges and universities, which are still the dominant deliverers of higher education—will continue to be viewed by the public as responsible for the quality of these providers. Accreditors will need to provide guidance to the public on how to reach judgments about quality in these new settings—what to examine, whom to contact, how to make comparisons. The reputation and seriousness of higher education is at risk and we have the responsibility to reach beyond the institutions we serve to respond to public need.
Addressing public interest and concern for quality means speaking out and working together on:

- Strengthening consumer protection;
- Providing clear communication about quality issues among accreditors and those who undertake alternative forms of external quality review of education and training (certification boards, for example);
- Assuring quality in transfer of credits in a distance learning environment;
- Expanding state licensure of institutions and programs in light of distance learning; and
- Expanding efforts to educate the public about the importance of external quality review and the role of accreditation in our society.

Serving the public interest also means committing ourselves to clarifying the social role and purpose of college and universities; improving the quality of higher education while expanding its availability; and responding to the changing profile of higher education students. All are tasks for accreditors as they reflect on how quality assurance can best meet public needs in this environment of mixed site- and distance-based learning opportunities (Greenberg, 1999).

By rethinking the politics of the relationship between government and higher education with the aim of preserving the autonomy of institutions and by paying greater attention to higher education's responsibility to build public confidence in educational quality, accreditors can address some of the political challenges posed by distance education. The public will expect the higher education community to organize itself to maintain quality in a distance learning environment or it will turn to another source—government or the business sector—to provide the necessary quality assurance.

The academic and political challenges posed by distance learning are making great demands on higher education. If experience with significant challenges of the past is any indication, higher education's response will be forceful and effective. Keeping the fundamental values of the enterprise intact, higher education will sustain and enhance the quality of its academic work and strengthen its relationship with government through continued demonstration of this quality in programs, colleges and universities.
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