SACSCOC (STILL) MATTERS:
An ongoing column addressing compliance issues

Distance Education (AKA Online) standards and related issues

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Apposite the Federal Requirements (FR), I have been asked to share any SACSCOC insights related to online pedagogical: several FR’s – notably the triad of 4.8 requirements – specifically address DOE-mandated technical online requirements, such as:

<table>
<thead>
<tr>
<th>FR 4.8 (Distance and correspondence education)</th>
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<td>4.8.1 (identity of a student who participates in class or coursework)</td>
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<td>4.8.2 (written procedure for protecting the privacy of students)</td>
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<td>4.8.3 (written procedure distributed at the time of registration or enrollment that notifies students of any projected additional student charges)</td>
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Due to the expert leadership of its Online Division, the university complied very handily with these requirements on our 2015 reaffirmation. More recently - as the committee member assigned to review these FR’s (I am regularly assigned these standards in addition to my usual complement of library and technology standards), I also had the occasion to work more closely with them as a member of an on-site reaffirmation team.

To address such issues, the SACSCOC’s website touts its:

- Commission Policies
- Commission Guidelines
- Commission Good Practices
- Commission Position Statements

SACSCOC defines a commission policy as:
By the way, politicians, as well as political commenters bent on diffusing their noise-machine agitprop, often talk derisively about statutory “overbreadth,” which connotes the excessive broadness, for example, of a statute that in proscribing unprotected speech might also prescribe protected speech. In its disparagingly jurisprudential application, overbreadth is also often referred to as “lochnerization,” a legal method to examine and overturn economic legislation under the guise of enforcing the “Due Process Clause” (cf.: Lochner v. New York, 198 U.S. 45 [U.S. 1905]).

That is not what is going on here with SACSCOC and online issues, for: in June 1997 – now, almost twenty years ago, SACSCOC initially adopted its official online policy statement: “DISTANCE AND CORRESPONDENCE EDUCATION Policy Statement,” to which it refers throughout the Principles of Accreditation. Subsequently, SACSCOC updated this policy in accord with the revised Principles, in December 2006; then they were revised by the SACSCOC Board of Trustees in June 2010; re-edited in January 2012; and, finally, reformatted in July 2014. This policy also offers a “Definition of Correspondence Education.” The three-page SACSCOC “DISTANCE AND CORRESPONDENCE EDUCATION Policy Statement” lists the following five sub-statements, the first threw of which basically encapsulate the 4.8.1-.3 Federal Requirements:
Policy Statements

1. At the time of review by the Commission, the institution demonstrates that the student who registers in a distance or correspondence education course or program is the same student who participates in and completes the course or program and receives the credit by verifying the identity of a student who participates in class or coursework by using, at the option of the institution, methods such as (1) a secure login and pass code, (2) proctored examinations, and (3) new or other technologies and practices that are effective in verifying student identification. [This is essentially FR 4.8.1]

2. At the time of review by the Commission, the institution demonstrates that it has a written procedure for protecting the privacy of students enrolled in distance and correspondence education courses or programs. [This is essentially FR 4.8.2]

3. At the time of review by the Commission, the institution demonstrates that it has a written procedure distributed at the time of registration or enrollment that notifies students of any projected additional student charges associated with verification of student identity. [This is essentially FR 4.8.3]

4. An institution that offers distance or correspondence education must ensure that it reports accurate headcount enrollment on its annual Institutional Profile submitted to the Commission.

5. Institutions must ensure that their distance and correspondence education courses and programs comply with the Principles of Accreditation. This applies to all educational programs and services, wherever located or however delivered.

At the application level, this policy also contains a bulleted section more specifically addressing the following:

- Mission
- Curriculum and Instruction
- Faculty
- Institutional Effectiveness
- Library and Learning Resources
- Student Services
- Facilities and Finances

For our purposes, the Institutional Effectiveness bulleted section – restated below - may be of particular interest:
Comparability of distance and correspondence education programs to campus-based programs and courses are ensured by the evaluation of educational effectiveness, including assessments of student learning outcomes, student retention, and student satisfaction. The institution regularly assesses the effectiveness of its provision of library/learning resources and student support services for distance or correspondence education students.

In addition to this commission policy, SACSCOC also promulgates the following Guidelines for Addressing Distance and Correspondence Education: A Guide for Evaluators Charged with Reviewing Distance and Correspondence Education (see: SACSCOC Resource Manual, Appendix C, pp. 127ff). In the words of SACSCOC,

This Guide provides assistance for committee members when preparing to serve as evaluators of distance and correspondence education. It should be used in conjunction with the Principles of Accreditation, the Resource Manual, and the Handbook for Peer Evaluators as well as the Commission policy “Distance and Correspondence Education.”

Notably, this guide lists “An Overview of Expectations,” in which it allows that “Accreditation is a higher education self-regulatory mechanism that plays a significant role in ... in enhancing institutional effectiveness.” Intriguingly, although “institutional effectiveness” appears 34 times in the SACSCOC Resource Manual, the word “online” only appears once...in the Appendix C section. All other references are subsumed under “distance education” or “correspondence education.” SACSCOC Guidelines do list the following definition of Distance Education:

For the purposes of the Commission on College’s accreditation review, distance education is a formal educational process in which the majority of the instruction (interaction between students and instructors and among students) in a course occurs when students and instructors are not in the same place. Instruction may be synchronous or asynchronous. A distance education course may use the internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or video cassettes, DVD’s, and CD-ROMs if used as part of the distance learning course or program.

[rubrication added for emphasis]
In a July 13, 2015, email to the Accreditation in Southern Higher Education (ACCSHE) listserv, Virginia Kinman, the Assistant Vice President for Accreditation and Compliance at Longwood University in Farmville, VA, broached the following questions regarding a definition of online:

We have changed our definition of hybrid from 50% or more of instruction (which corresponds to the SACSOC definition of distance education) to 30% or more of instruction. This will extend the requirement for training to instructors who are teaching a course with 30% or more of instruction delivered online. We code courses as either hybrid (which will now be 30-99% online) or online (100% online).

Can we use our internal 30% or more definition instead of the SACSCOC 50% or more distance education definition when demonstrating compliance with the Principles for distance education? For example, in our 2013 Compliance Certification Report, we compared the percentage of full-time faculty who taught face-to-face classes with those who taught classes that were 50% or more online. In the future, can we use our internal 30% definition instead for 2.8 and other standards where we would use generated student credit hours in calculations to isolate distance education? This will affect how we code courses going forward.

I would still expect to track which programs are 50% or more online for the Institutional Summary.

I’m not sure if I’ve expressed my question well. The bottom line is that we really don’t want to have to code courses that are 30-49% online differently from those that are 50% or more online. Has anyone else dealt with this recently?

My response to her ACCSHE questions – and my suggestion to SU for any definition that it might devise - would be: SACSCOC is not prescriptive, but does require that, first: institutions propitiate the requirements of all parts of all standards; and, second, institutions adhere to any associative policies, such as those that might supervene for online that they have set in place in accordance with the famous SACSCOC “implicit” policy statement:

The Requirement of a Policy:
Implicit in every Core Requirement, Comprehensive Standard, and Federal Requirement mandating a policy or procedure is the expectation that the policy or procedure is in writing and has been approved through appropriate institutional processes, published in appropriate institutional documents accessible to those affected by the policy or procedure, and implemented and enforced by the institution. At the time of review, an institution will be expected to demonstrate that it has met all of the above elements. If the institution has had no cause to apply its policy, it should indicate that an example of implementation is unavailable because there has been no cause to apply it. (See Commission best practices, “Developing Policy and Procedures Documents.”)
Also, Appendix C provides some elucidating “Generic Questions Related to the Distance and Correspondence Education Programs Being Reviewed.” Again, the university satisfactorily addressed these questions as detailed below:

- What distance and correspondence learning courses and programs are being offered?
- What are the modes of delivery for the programs? The description should include hybrids of online/face-to-face, etc.
- Where are they offered?
- Why did the institution choose to offer these programs through a distance learning mode?
- Who are responsible for the academic and administrative coordination of the programs?
- Who are “teaching” the courses? Are the faculty of record the same faculty employed by the institution?

Ah, institutional effectiveness assessment: “There’s the respect/That makes calamity of so long life,” as Hamlet says in Act 3, scene one. For - as many of you know, the university’s primary third-party assessment relies upon the validity of data gleaned from both the Ruffalo Noel-Levitz℠ Student Satisfaction Inventory™ and Priorities Survey for Online Learners™ assessment instruments. While the University uses the Ruffalo Noel-Levitz℠ PSOL™ to assess the satisfaction of services provided to online students assigned to the Online Division, it is not administered to other students taking online courses. The SU IR Director has observed:

the lack of congruence between the Online Division as an administrative, course-offering, and service-providing entity and the campus identifiers attached to the students taking online courses. Certainly, students with an online identifier take only online courses, with few exceptions. But students with brick-and-mortar campus identifiers also take many online courses. When we say that we want to assess online students, does it make sense to assess only those with an online identifier? Or for that matter, does it make sense to include the student with a brick-and-mortar identifier, but who takes only online courses, in with those students who take only (or mostly) face-to-face courses? If we want meaningful assessments, we will have to build them upon meaningful definitions.
Expressed another way by the SU Dean of the Online Division:

*There is no mechanism to assess the online experience of those considered to be “hybrid” students or those from Louisville, Lexington or Ft. Knox who may be taking all online courses, since they are serviced by their physical location and the Ruffalo Noel-Levitz SSI is designed for on-ground courses and services.*

At present no formal SU/SUS definition of an “online student” exists in either the SUS or SU faculty/staff manual or in the catalog. The Dean of the Online division tells me, “we have definitions for online and hybrid courses. Online courses are those in which all instruction occurs online and there are no required face-to-face class sessions. Hybrid courses include a combination of face-to-face and online class sessions. Normally, a fully online student would be defined as one who is taking online courses exclusively, while a hybrid student would be taking a combination of online and on-ground courses. In actual practice, the situation is a bit more complicated.” If we harken back to the SACSCOC “Distance Education” statement related ostensibly to its IE assessment, above, it – in concert with CR2.5 and CS 3.3.3 - mandates regular assessment of the “comparability of distance and correspondence education programs to campus-based programs and courses...including assessments of student learning outcomes, student retention, and student satisfaction.”

While current mechanisms can track retention and satisfaction of campus-based and online students and can also track learning outcomes at the course level, it is not possible to compare campus-based versus online degree or certificate programs. This is because Sullivan University has no program that is exclusively campus-based for some students and exclusively online for others. While Louisville and Lexington by-campus assessment (as detailed in Dr. Nick Riggs’ excellent assessment table listed below) may be compared, including a comparison of the campus-based courses taken at each location, there are no Louisville-online or Lexington-online courses. A single online course may include students from Louisville, Lexington, Ft. Knox and those assigned to the Online Division.
As heretofore noted, unfortunately, the university has not been assessing the experiences of hybrid students, but this may improve soon.

I am grateful to the invaluable insights of my colleagues for this article which should provide the SU academic community with a SACSCOC-filtered overview of this important subject.