

The 42 Million Dollar Question

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# The 42 Million Dollar Question

Is your program Distance Education or  
Correspondence Education?  
*Some learning from a recent case.*

Distance Education (DE)

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## Distance Education (DE)

- Instruction delivered to students who are separated from the instructor
- Regular and substantive interaction between students and the instructor
- May use Internet, one- or two-way transmissions, audio/video conferencing, DVDs or CD-ROMs

34 C.F.R. § 602.3 (Definitions).

Correspondence Education (CE)

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## Correspondence Education (CE)

- Instructional material provided by mail or electronic transmission (including examinations) to students who are separated from the instructor
- Limited interaction between student and instructor and primarily initiated by students
- A course that is typically self-paced

34 C.F.R. § 602.3 (Definitions).

Saint Mary-of-the-Woods Audit

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## Saint Mary-of-the-Woods Audit

*Elements of the case pertinent here:*

Undergraduate courses and Teacher Licensure courses online marketed under the college's "Woods External Degree (WED)" program.

Courses offered on a Learning Management System, with assigned instructors, scheduled for a full semester with option for 3-month extension if work incomplete at semester's end.

the auditors reviewed:

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## the auditors reviewed:

- Program descriptions on college website, materials in catalog (handbook) and brochures.
- Interviews with administrators, instructors and students.
- Course syllabi picked by auditors from across the disciplines, sections which had large enrollments.
- Course content online and records of student and instructor activity on the Learning Management System.

Elements considered in the decision of distance education or correspondence ed:



## Elements considered in the decision of distance education or correspondence ed:

- System had features for participating in discussion boards, chat rooms, and viewing videos, but these were not required.
- Grading was based upon submission of assignments and tests, not on any online communication/interaction.

Elements considered, continued

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## Elements considered, *continued*

- Instructors graded assignments and returned them online, were available to answer questions, and periodically sent messages to students if the students were not submitting assignments.
- Instructors did not deliver lectures or initiate discussions with students; tutoring and other instructional resources were provided at the student's discretion.

Elements considered, continued

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## Elements considered, *continued*

- Syllabi described the reading and assignments, and offered suggested schedules for student completion of the work.
- Syllabi did not describe any mandatory or regular and substantive interaction between students and instructors.
- Student posts and discussion forums were student driven; grades were not affected if students did not use the features.



Conclusion:

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## Conclusion:

“We concluded the College was not eligible to participate in [federal financial aid] because 50% or more of its students were enrolled in correspondence courses... We recommend... require the college to return to the U.S. Department of Education the \$42,362,291 in Title IV funds disbursed...”

Final Audit Report, Executive Summary

## Implications for Colleges

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# Implications for Colleges

- Effective practice is required at the course level: USDE audits can include examination of syllabi, student and faculty interviews, and usage patterns on the Learning Management System by faculty and students.
- Courses which largely consist of written work completed and submitted by students and graded by instructors, and/or completion of tests, will fit the definition of correspondence education rather than distance education.

Of note for online-aided on-site courses

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## Of note for online-aided on-site courses

### *Correspondence course:*

- (1) A course provided by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. Interaction between the instructor and student is limited, is not regular and substantive, and is primarily initiated by the student. Correspondence courses are typically self-paced.
- (2) If a course is part correspondence and part residential training, the Secretary considers the course to be a correspondence course.**
- (3) A correspondence course is not distance education.

34 C.F.R. § 602.3.

Advice for online-aided on-site courses

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## Advice for online-aided on-site courses

Classes which are on-site, but which include independent online student work for some portion of the instructional hours, should ensure the online portion of the class has elements of instruction and teacher-to-student interactivity, so as to avoid having the entire course defined as correspondence education.



Regular and substantive interaction between student and teacher

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## Regular and substantive interaction between student and teacher

- Is central in determining whether a course is distance education rather than correspondence education.
- Is needed in every course that is fully online and in the online elements of courses otherwise on-site.
- Must be demonstrable and documented.
- Is vital to a college's relationship with the U.S. Department of Education for student financial aid eligibility.
- Is key to quality education and the student outcomes required by the ACCJC Accreditation Standards.

Final Note on Role of Accreditor

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## Final Note on Role of Accreditor

Saint Mary-of-the-Woods College was accredited by the Higher Learning Commission (HLC).

The HLC completed a substantive change review for the college in 2009 and changed the program in question to distance education from correspondence, based upon the college's plan to transition from correspondence to online delivery by January 2010.

Auditors found this did not absolve the previous activity of the college. "HLC did not reexamine the program as offered in the past. In addition, HLC's determination that the WED program was no longer a correspondence program is not binding on the U.S. Department of Education."

From Final Audit Report ED-OIG-A05K0012