

**EVIDENCE OF QUALITY IN DISTANCE  
EDUCATION PROGRAMS DRAWN FROM  
INTERVIEWS WITH THE ACCREDITATION  
COMMUNITY**

**U.S. Department of Education  
Office of Postsecondary Education**

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## INTRODUCTION

This report is in response to the GAO Report to Congressional Requesters on Distance Education (GAO-04-279). The GAO recommended that the Secretary of Education “(1) develop, with the help of accrediting agencies and schools, guidelines or a mutual understanding that would lead to more consistent and thorough assessment of distance education programs, including developing evaluative components for holding schools accountable for such outcomes and (2) if necessary, request authority from the Congress to require that accrediting agencies use these guidelines in their accreditation efforts.”

The Office of Postsecondary Education, in responding to these recommendations, agreed to engage in discussions with accrediting organization staff and other experts to identify best practices in the accreditation of distance education. Further, it agreed to use the information gathered from these discussions to develop guidance for staff in the Accreditation and State Liaison Unit to use in evaluating accrediting agency reviews of distance education when making an initial recommendation about whether to include the evaluation of distance education in an agency’s scope and when an agency petitions for renewal of recognition, and to share the guidance with the accreditation community.

The guidance contained in this report, which is in the form of best practices, was developed in a manner that is sensitive to the Department of Education’s limited authority to regulate accrediting agencies. The Department believes that accrediting agencies already have the authority to apply these best practices in their evaluation of distance education in the context of their individual standards.

Department staff identified twelve accrediting organizations whose scope of recognition as determined by the Secretary of Education includes the evaluation of distance education and invited staff from these organizations to participate in one of two discussion sessions. One discussion group consisted of representatives from each of the seven regional accrediting agencies; the other included representatives from five of the ten national accrediting agencies that meet the criterion. The following accrediting organizations participated in the discussions:

### Regional Accrediting Associations

Middle States Association of Colleges and Schools, Commission on Higher Education (MSA)

New England Association of Schools and Colleges, Commission on Institutions of Higher Education (NEASC)

North Central Association of Colleges and Schools, The Higher Learning Commission (NCA)

Northwest Commission on Colleges and Universities (NWCCU)

Southern Association of Colleges and Schools, Commission on Colleges (SACS)

Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges (WASC Junior)

Western Association of Schools and Colleges, Accrediting Commission for Senior

## Colleges and Universities (WASC Senior)

### National Accrediting Associations

Accrediting Commission of Career Schools and Colleges of Technology (ACCSCT)

Accrediting Council for Continuing Education and Training (ACCET)

American Speech-Language-Hearing Association, Council on Academic Accreditation in  
Audiology and Speech-Language Pathology <sup>1</sup> (ASHA)

Commission on Accrediting of the Association of Theological Schools (ATS)

Distance Education and Training Council (DETC)

Next, Department staff asked the participating organizations to provide contact information for one or more individuals with experience serving on evaluation teams for schools offering distance education programs. Nineteen of the twenty educators recommended by the accrediting agencies agreed to be interviewed concerning how they have approached the evaluation of distance education and what they have considered to be appropriate evidence that the standards have been met. A complete list of participants is included at the end of this report.

### **Accreditation Standards and Types of Distance Education**

The accrediting organizations that were included in this examination vary in the way that they formally address the evaluation of distance education. Four of them (ACCSCT, ATS, DETC, and MSA) have separate or additional standards related to distance education. ACCET, ASHA, NEASC, NWCCU, and SACS have developed policies or guidelines that direct reviewers to the standards that should be looked at most closely when evaluating distance education. WASC Junior includes in its *Distance Education Manual* specific questions reviewers should use in their evaluation. NCA refers to *Guidelines for Distance Education* that the regional accrediting associations mutually developed and agreed to, which are used by reviewers in conjunction with the accreditation standards. In talking with reviewers, there was remarkable consistency in how they evaluated distance education programs, and in what they considered to be most important indicators, in spite of the differences in the accrediting organizations' standards and means of addressing distance education.

It should be noted that, with the exception of the Distance Education and Training Council (DETC) staff and evaluator who were interviewed, there was little discussion of the evaluation of correspondence or self-paced programs. DETC representatives remarked that DETC's standards and criteria were developed with correspondence education in mind, but that the standards can also be applied to a web-based online learning environment. The evaluator also commented that there is increasing use of online distance education by DETC-accredited schools. Several of these schools are using cohort-based models, particularly in degree programs, rather than the self-paced model that is a hallmark of correspondence education. In a cohort-based model, all of the students begin and end the course at the same time, which allows for greater interaction

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<sup>1</sup> Not recognized for Title IV purposes.

among students. The evaluator observed that the success rates are higher in a cohort-based model than in a self-paced model.

While the regional accrediting agencies do have among the institutions they accredit those that offer some correspondence or self-paced education, the staff primarily discussed the evaluation of electronically-delivered distance education programs. Evaluators for regional accrediting agencies reported that they had not been called upon to review correspondence or self-paced programs and noted that there is a preponderance of online distance education being offered by regionally-accredited institutions. Many of these institutions are redesigning their correspondence courses for online delivery. The vast majority of new distance education programs are offered online with a cohort-based model. The national accrediting agencies, other than DETC, that were included in this analysis do not accredit correspondence programs.

## **GOOD PRACTICES AND RED FLAGS**

The discussions with the nineteen evaluators from the accrediting organizations that have distance education included in their scope of recognition yielded a great deal of specific information about the kind of evidence they consider to be indicative of quality in distance education, and also indicators of possible problems with the way the institution or program is approaching distance education. While their reviews were guided by different standards, the evidence they identified can be organized into several general categories. It should be noted that the good practices are limited to evidence that is specific to distance education and does not constitute the totality of evidence reviewers would consider in making assessments of the quality of an institution or program. On the other hand, no accrediting agency would need to include all of the evidence detailed in this report in order to make judgments about the quality of distance education.

Peter Ewell, Vice President of the National Center for Higher Education Management Systems (NCHEMS), has observed that distance education is often held to a higher standard than traditional education when judging quality. This observation was echoed by several of the reviewers.

This evidence is presented below as “good practices” and “red flags”. It is intended primarily to serve as a resource for analysts in the Department’s Accreditation and State Liaison Unit in assessing accreditation agency applications and supporting documentation that address the evaluation of distance education. However, it is anticipated that this information may also be of interest to the accreditation community.

### **Mission**

Evaluators were clear about the importance of ensuring that distance education is appropriate to the mission of the institution under review. The rapid increase in the number of institutions offering distance education courses and programs in the last decade, and the pressure to launch distance education initiatives, can lead an institution or program in directions that are not congruent with its mission. The discussion around this

issue yielded good examples of the kinds of evidence that reviewers have found to be indicative of a match between mission and distance education.

- For an institution with significant numbers of distance education programs, the reviewer would expect the institutional mission statement to be explicit about increasing access, or reaching out to underserved or special populations (such as working adults). Most reviewers see distance education programs as serving students who need flexibility in terms of time and location.
- For an institution that is offering courses but no full programs, or only a program or two, the reviewer expects to find a well-articulated statement of why the institution is developing the courses/programs. This might be included in planning documents or be noted by the academic dean or department head during interviews. The statement would make clear how this strategy will further the institution's mission. For example, an institution might be using distance education as a way to serve on-campus students by providing them the flexibility they need to complete degree requirements in a timely fashion. Alternatively, it might be extending a program to populations that the institution or program could serve but who are unable to travel to onsite locations.
- In either case, a key factor to examine is what populations are being served. Distance education is obviously a good fit for working students and for those whose schedules involve frequent travel. Online education may be appropriate for institutions that place a strong emphasis on developing technical fluency in their graduates, since successful online students learn how to work effectively in a distributed environment using technical tools.
- If the institution is a traditional university whose mission is to serve traditionally-aged college students where socialization is an important role, distance education could be an appropriate strategy to develop technical fluency. However, it would raise questions if the programs serving these students were to be delivered entirely via distance education with no provision for fulfilling the institution's socialization role.

### Red flags

- Senior administrators are not able to articulate the strategic importance of distance education and its role in the broader mission of the institution.
- A review of course and program offerings reveals a shift in the balance between face-to-face and distance education, when the two formats serve significantly different student populations. This may be evidence of an institution drifting from its mission, unless it is part of the institution's strategic plan. Alternatively, it could signal the need for a revised mission.
- Program documents, faculty, or staff identify target populations for distance

education offerings that are significantly different from the populations the institution has served in the past, such as international students.

## **Curriculum and Instruction**

Historically, distance education was not part of the mainstream of higher education. At traditional institutions, it was often under the purview of the continuing education division, where administrative control was relatively strong and faculty often played different roles than in their academic units. In some continuing education operations and in less traditional institutions, the development of curricula and courses was centralized, with faculty serving on teams as “content experts” or “curriculum specialists”. The faculty/content expert/curriculum specialist might be one of several instructors – including adjunct faculty – assigned to teach the course, using the centrally-developed materials.

These models continue to be reflected in current practice at many institutions. Other institutions – particularly the more traditional institutions that are moving into online education – have employed existing academic structures in the development of their distance education courses and curricula. In these cases, faculty typically develop and teach their own courses. However, as these programs grow, the likelihood of the institution employing adjunct faculty with online teaching experience increases. Whatever the approach, reviewers look for evidence that the process used will result in coherent curricula and well-designed courses, and that there is appropriate academic oversight.

Reviewers for regional accreditation agencies look for evidence that faculty who are involved in governance have oversight of the curriculum.

- A good practice is to examine the documentation of the program planning and evaluation process or to interview the faculty leadership about the process. The reviewers then confirm that the processes are followed by looking for additional evidence such as minutes from faculty meetings, interviews with individual faculty about their involvement in planning and decision-making, and written assessments of curricular materials.
- In situations where outside experts are used to build courses, the reviewers ensure that faculty have defined course scope and objectives and that faculty review the courses after they have been developed.

In the national accrediting agencies, there is often less emphasis on the role of faculty and greater reliance on outside subject matter experts (including advisory committees) who work with the educational director or chief academic officer to establish curricula and to identify, review and develop appropriate materials.

- A good practice is for reviewers to look at the qualifications of the educational director (including experience with distance education) and for evidence of student success in the programs the director has overseen.

- In addition, the reviewers look at the process the institution uses to identify and solicit resources, and evaluate the qualifications of outside experts to fulfill their assigned roles.
- Reviewers look for evidence that the school has researched the industry, has reviewed curricula of programs offered by mainstream schools, and has adopted mainstream texts. These activities should lead to better-informed decisions about curricular goals, course objectives and instructional resources, which will provide students with marketable knowledge and skills.

The development of a coherent curriculum, rather than a collection of courses, requires a systematic and coordinated approach to planning. A good practice for evaluators of distance education programs is to look for:

- a logically sequenced course development schedule that will ensure the availability of courses as students need them;
- faculty training sessions that are aligned with the development schedule;
- the use of a common platform (for online courses);
- some consistency in course formats; and
- a schedule of course offerings for the next few years to assist students in planning.

Curricula that include laboratories, hands-on learning components and practicums pose challenges when they are adapted for distance education delivery.

- A reviewer expects the curriculum planning documents to specifically address how these components will be provided and what kind of processes are in place to ensure adequate oversight by qualified personnel.
- If an institution contracts with others (some examples include another educational institution, a clinic, or a private technical training company) to provide any of these resources, evaluators expect to see provisions in the written agreement addressing elements that are key to ensuring the experience will support the learning outcomes.

The review of distance education curricula also includes an appraisal of actual courses.

- A good practice is to review a sample of syllabi to see whether course descriptions and learning objectives are clearly stated and whether the assignments and other assessment strategies are mapped, or connected to, the learning objectives.
- If the courses are offered in both face-to-face and in distance education modes, reviewers look for comparable or equivalent learning objectives.

- The structure of the course is also a critical element. Courses that are designed with benchmarks and clear deadlines or recommended schedules provide evidence that the institution is aware of some of the time management challenges, and risk of attrition, of distance learning students, who are typically juggling a variety of roles including work, family and study.
- A close examination of the course syllabus is a strategy for reviewers to assess the degree of importance of interaction between faculty and student and among students. Some evidence might include requirements for students to: participate in discussions, evaluate drafts of other students' work, and work in small groups on projects. Other evidence would be the inclusion in the grading rubrics of "quality of participation" in discussions and group work.
- Use of the same interface (in online courses) or layout (in print-based courses) lessens confusion for students and is an indicator of good course design and institutional oversight. In print-based courses, "layout" would encompass the course overview and course objectives, unit objectives, narrative discussion, learning activities, and review questions. For online courses, the use of the same course management system will result in a common interface and basic course structure.

Reviewers evaluate instruction in online courses by accessing the courses themselves as they are in progress, or by reviewing transcripts of courses previously offered.

- It is a good practice for reviewers to request access to several courses in addition to those the institution initially provides in order to avoid seeing only those that are considered exemplary. A review of a variety of courses allows the evaluator to determine whether there is some consistency in quality as evidenced by course design, basic pedagogical approach, use of tools, and level and types of interaction among students and between students and faculty.
- Further, the reviewers examine the extent to which faculty add value beyond what a student would read in a textbook. For example, the faculty member might provide additional information or resources to assist students in understanding difficult concepts; pose questions and facilitate and summarize group discussions; be available to answer individual questions about course material and assignments; and give detailed feedback on assignments.

### Red flags

- Procedures for approval of distance education curricula differ from those for traditionally-delivered curricula. For example, the distance education curricula are not reviewed by the faculty curriculum committee.
- The curriculum plan indicates that a large number of students are expected to enroll in each section of an online course. This could compromise the effectiveness of interaction between the students and faculty unless additional provision is made to accommodate large numbers.



- The curriculum design does not take into consideration the target population. For example, an online curriculum designed for shift workers includes courses that require students to participate in synchronous activities (such as online chat sessions) at a specified time. This could conflict with some of the students' work (or sleep) schedules.
- The use of only a single method of assessment in a course might indicate that the course does not adequately link assessments and outcomes.
- Students express dissatisfaction with the quality of their distance education courses.
- Courses lack objectives.
- Courses are all very much alike, indicating a "cookie-cutter" approach to course development. While the use of the same platform will provide some consistency in online courses, a reviewer expects courses to make use of different instructional strategies and tools to fulfill their individual objectives.
- The discussion board in an online course shows little or no activity.
- The majority of student postings lack substance and show little evidence of reflection or critical thinking.
- There is rapid turnover in adjunct faculty assigned to teach courses.
- Course materials have not been updated in over five years. For certain curricula, the updating should be done more frequently.

### **Faculty Support**

Distance education places new demands on faculty. Most faculty come to distance education with classroom experience, and few have experienced distance education either as instructors or as students. They are used to functioning independently – developing courses without assistance from others and managing the classroom on their own. Conditions are different in a distance learning environment, where a support system needs to be in place to ensure a quality experience. Reviewers were united in their conviction that an institution needs to approach distance education in a systemic manner, which includes providing a range of faculty support services.

Faculty development is a critical component for ensuring quality in distance education.

- It is a good practice for reviewers to ask about the extent and frequency of the training that is provided. Good training is broader than software training. It addresses distance education pedagogy, with specific emphasis on instructional strategies to foster interaction, to convey concepts, and to assess student learning.

It also provides guidance to a faculty member on how to translate an onsite course to the distance delivery mode being used in order to achieve specific learning outcomes.

- It should be clear what organizational unit is responsible for providing the training and on-going support for faculty.

Providing faculty access to specialized resources and technical support for course development and delivery is also a sign of a quality distance education initiative.

- In interviews with faculty, it is a good practice for reviewers to ask about what resources faculty are given and their satisfaction with the support the institution provides.
- In addition to a high level of faculty satisfaction, indicators include the availability of someone with instructional design skills during course development and of personnel who are able to resolve technical problems that arise during delivery.

In order to achieve some consistency in the quality of instruction, adjunct faculty should have training and support comparable to that provided the regular faculty. Additionally, adjunct faculty need to be integrated into the culture of the institution.

- It is a good practice for reviewers to interview some adjunct faculty members to determine the kind of training and support they receive and their sense of engagement with the institution.
- Additional evidence of adjunct faculty integration includes their participation in faculty meetings, service on faculty committees, involvement in discussion forums, and selection as mentors to new faculty.

### Red flags

- Comments from faculty indicate that they have directly translated their traditional course to a distance education course. This may indicate inadequate consideration of distance education pedagogy.
- Faculty are given primary responsibility for resolving technical issues for students or are required to produce their own courses (upload materials, find or design graphics, etc). This may indicate that the support structure for distance education is lacking.
- A number of faculty engage in distance education course development and delivery, while carrying a full-time teaching load. This may be a sign that the institution is not building the appropriate systems to sustain a growing distance education initiative.
- Student evaluations of sections of courses taught by adjunct and regular faculty show wide variation between the two.

## Student and Academic Services

Students who are enrolled in distance education programs often are unable to come to the campus or off-campus location for the administrative, student and academic services they need. Institutions offering full programs via distance education need to provide the full range of services at times and in ways that are convenient for these students. These services include admissions and registration, enrollment advising, academic advising, financial aid, career counseling, library resources, textbook ordering, technical assistance, and veterans and disability assistance. Advances in technology have had a significant impact on the way that institutions provide services, particularly administrative and library services, to all of their students. This has helped to narrow the differences in the way distance education and residential students are served, but it does not always result in distance education students receiving a full range of services.

To be successful, students who are admitted to distance education programs need to have the appropriate equipment and personal characteristics, such as being self-directed and having good time management skills. A good practice is for evaluators to review the kinds of information and resources an institution provides prospective students.

- Providing prospective distance education students with a self-assessment of their skills and aptitude for distance learning is good evidence that the institution is attempting to enroll students with the appropriate characteristics in their distance education programs.
- A distance education orientation program, or primer, can give prospective students an idea of how they will fare in a distance education course.
- A website that serves prospective distance education students would include a thorough description of how the courses will be offered, how students will get textbooks and other materials, the kinds of equipment needed (which may include an online equipment check), any requirements for on-campus work, and a way to contact an advisor.

Distance education students should not experience significant delays in getting the resources they need to be successful academically. Reviewers look for policies and practices that indicate a commitment to providing distance learning students with timely and accessible services and information.

- For electronically-delivered courses, evidence that technology support services are sufficient includes specific standards for response time to problem reports and data on actual response times and problem resolution, combined with student survey or interview data showing satisfaction. Ideally, technical support is available 24/7 (24 hours a day, seven days a week). If this is not present, reviewers look for technical support being available during some evening and weekend hours and provision for dealing with an emergency situation. In addition, there should be a means to communicate with students if a technical problem, such as a network outage, will affect them.

- Faculty provide information to students (in the syllabus, for example) about the timeframe in which they will respond to questions and assignments. These fall into parameters established by the institution or program.
- Information is provided to distance education students on how to contact an academic advisor. Students are able to consult academic advisors from a distance – by phone, fax, email, and/or online chat.

Library resources (i.e., electronic databases) are increasingly available in electronic form for both onsite and distance education students. Nonetheless, there are things that need to be in place to ensure that distance education students are well-served.

- Reviewers examine the online library site to confirm that distance education students are provided information and training on how to use these resources, and that they have access to a librarian by phone, fax, email and/or online chat to request assistance or services, such as inter-library loan.
- Further, reviewers look for evidence that students use these services, such as statistics on number of webpage hits or number of database searches and syllabi that include course assignments requiring library research.

### Red flags

- An institution that offers full programs by distance education, with no onsite components, requires students to come to campus for some student services.
- The distance education office is responsible for providing all services to students, rather than having services provided by specialized staff. This could indicate a lack of institutional commitment to distance education students.
- The student grievance process requires face-to-face meetings.
- Students don't know whom to contact if they have questions or problems.

### **Planning for Sustainability and Growth**

As should be evident from the preceding information, successful distance education initiatives draw on many different types of expertise, which typically are provided by staff from various parts of an institution. In instances where distance education programs involve only one or two departments, the distance education support system may be housed in a special administrative unit that provides direct service and also functions as a liaison to the relevant institutional components. If the initiatives involve more than one or two departments, evaluators would look for evidence that the institution is using – or moving toward – a systemic approach whereby student, academic and faculty services related to distance education are integrated into the various components of the institution. This systemic approach is most conducive to long-term sustainability.

The potential for growth in enrollments in distance education programs is great. The demand is large, particularly by students who benefit from the flexibility of distance education to balance multiple demands on their time from work, family and community. The constraints on growth that are operative in site-based programs, including a geographically-limited potential market and classroom availability and capacity, do not apply to distance education. Institutions need to be strategic about growing their distance education programs to ensure adequate resources to serve growing numbers of students. Chief among these resources are qualified and trained faculty to staff additional sections of courses; sufficient capacity in student and academic services and personnel; a robust, scalable technical infrastructure; and funds for course development and marketing of new programs.

In assessing the adequacy of an institution's planning for sustainability and growth of distance education, evaluators combine a review of strategic planning and budget documents with interviews with various constituents, including faculty, administrators and technologists. The kinds of evidence they consider to be positive indicators of adequate planning for sustainability and growth include:

- The institution's intent to increase the number of distance education programs and students is explicitly stated in planning documents and by institutional leaders.
- The strategic plan includes specific growth targets with budgets to support the additional marketing, academic and administrative costs. In addition, the plan includes some justification for the enrollment projections, such as marketing surveys, and contingency plans in the event that the targets are not met.
- There is a five-year technology plan that addresses the institution's goals for distance education related to enrollment, academic and student services, course development, and faculty support.
- There is a strategy for identifying, hiring and training faculty needed for new programs and for those that are expected to grow.
- The revenue derived from distance education programs is invested to sustain and strengthen the institution's capacity to provide quality distance education programs and services.
- Results are used to make decisions about resource allocation.

#### *Red flags*

- The distance education administrators are the only staff who discuss plans for distance education. Without executive commitment and knowledge, the institution is unlikely to have the resources in place to sustain the programs and support enrollment growth.

- Interviews with faculty and staff reveal that growth in enrollments exceeds the institution's capacity to provide appropriate academic and student support services.
- There are no internal agreements about how distance education programs will be supported in institutions for which distance education is limited to one or two departments. Without such agreements, there is a danger that changes in personnel will result in lack of support.
- The institution has a history of introducing programs and discontinuing them before enrolled students have had the opportunity to complete them.
- New programs are launched on the basis of perceived need, but without any research indicating there is a market for them.

### **Evaluation and Assessment**

Evidence of educational effectiveness at institutions offering distance education programs differs little from the evidence reviewers look for at institutions offering no distance education. Essentially, reviewers want to know how the institution measures student learning, how it assesses the experiences that lead to those outcomes, and what changes it makes based on the assessments.

In the interviews, reviewers frequently cited the importance of adequate feedback loops in the areas that are closely associated with quality in higher education – student and academic services, faculty development, and course development and delivery.

- At the course level, it is a good practice for reviewers to look at course evaluations, and to interview faculty about how they have used the course evaluations to improve their courses and about how these changes have affected student performance and outcomes.
- Course evaluations can also yield important information for improving faculty training and development. Reviewers ask those who design the training whether and how it has changed in response to course evaluations and other assessment information.
- In institutions where courses are developed centrally and individual sections are taught by faculty (including adjunct faculty) who were not involved in the original development, it is a good practice for reviewers to confirm that there is a mechanism in place to get information from the instructional faculty on how the courses can be improved, and that this is reflected in course revisions.
- Positive evidence that can be derived from faculty interviews includes information about how their onsite teaching has improved as a result of their distance education experience, accompanied by specific examples illustrating a positive impact on student performance.

- In terms of student performance, reviewers look for evidence that there is some response if students don't perform as required, such as referral to an academic advisor or tutor, or to some other resource. It is a positive indicator if an institution identifies struggling students who are enrolled in their first one or two distance education courses and provides them with the support they need to succeed in this environment, or to pursue a more traditional educational path.
- Reviewers query administrators about what processes are in place to document weaknesses in services to students, and ask for examples of ways the services have been improved as a result of the assessment. The ability to adapt and make change quickly is a strong indicator that the institution or program is student-centered.

Assessment of program outcomes is a critical component of educational effectiveness. Reviewers who were interviewed generally considered it appropriate to compare outcomes for programs offered both by distance education and onsite, if possible, while recognizing that individual students in the programs might have taken a mix of onsite and distance education courses.

- Some sources of evidence include: faculty evaluations of portfolios, which give good insight into the quality of student work over time; grade comparison at the program level; and student performance in capstone courses. Where employment is a purpose, reviewers look for post-graduate follow-up data involving both the graduates and employers.
- A good practice is to ask faculty, assessment specialists and the academic leadership about how they analyze the data from various sources and use it to make improvements. Reviewers request specific information about what has been learned so far about the quality of the programs offered by the institution and what changes have been made as a result.

#### *Red flag*

- Students coming out of distance education courses that are prerequisites are not doing well in follow-up courses.
- Large numbers of students are not completing distance education courses, or are not persisting in the program.
- Trends over time indicate that the retention, persistence or completion rates for distance education courses and programs is declining.
- The same complaints are received from distance education students from semester to semester.

## PARTICIPANTS IN DISCUSSIONS AND INTERVIEWS

<b>Organization</b>	<b>Staff</b>	<b>Evaluators</b>
Accrediting Commission of Career Schools and Colleges of Technology	Michale McComis Associate Executive Director	Dr. Dave Montanari Director of Instructional Technology and Distance Education (retired) Adams State College
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