Quality Standards and Accreditation of Distance Education Programs in a Pandemic

John Nworie
jnworie@kent.edu

Curtis B. Charles
drcurtisbcharles@gmail.com

Abstract

Quality and reputation are important value indicators for students learning online or in a conventional classroom setting. One of the ways that institutions demonstrate their achievement of quality is through accreditation. Though higher education institutions engage in the accreditation process voluntarily, an institution that is not accredited risks damaging its reputation, denies its students the privilege of attending an accredited institution, denies its students the opportunity to qualify for federal financial aid, impedes the institution's recruitment efforts, and prevents graduates of professional programs from sitting for national licensure examinations. Employers are also interested in knowing if potential employees attended an accredited institution. There are several ways distance education programs maintain quality and assure accreditation. This paper examined the issue of accreditation on distance education programs in higher education institutions and identified the accreditation agencies evaluating those programs. This paper takes a reflective view on the disruption that occurred to the process of quality assurance and accreditation of distance education in colleges and universities during and in the post-COVID-19 era and shares an outlook for action plans necessary to overcome similarly devastating disruptions in the future.

Introduction

If you have been even remotely engaged in higher education, you know that no institution can make a substantive accreditation change without first officially notifying the regional accreditation agency and then – months later – receive feedback (approval or denial) from the agency's executive council. "Distance and Correspondence Education" (SACS-COC, 2020) is one of those substantive-change policies that regional accreditation agencies have vigorously monitored to maintain quality control among member institutions. As a result, distance education (DE) changes require institutions to follow the Principles of Accreditation as they relate to the mission, curriculum and instruction, faculty, institutional effectiveness, library and learning resources, student success, and facilities and finance (SACS-COC, 2020).

Higher education institutions have witnessed the evolution of DE from paper and pencil correspondence courses to the development of an eclectic assemblage of online courses and, in recent years, an array of robust online learning courses and degree programs. The initial exploratory courses burgeoned into academic programs offering certificates, undergraduate, and graduate degrees. DE has moved from the sidelines to mainstream higher education operations and continues to grow.

The pandemic of 2020–21 resulting from the unanticipated COVID-19 virus significantly upended the operations of higher education institutions around the world. Colleges and universities suddenly found themselves engaged in a massive transference to emergency online teaching and learning. In an attempt to mitigate the spread of the deadly virus, faculty, administrators, and staff began working remotely; libraries, laboratories, and entertainment venues closed, and graduation ceremonies went virtual. In an uncharacteristic manner, institutions reacted expeditiously to ensure continuity, a demonstration of swiftness and adroitness that would have been incomprehensible under almost any other circumstance in higher education. Institutions' responses were both experimental and innovative; courses migrated to online platforms and were supported by a variety of delivery methods, including the use of course management systems and video conferencing. Faculty members, administrators, administrative support staff, and instructional support staff received on-the-fly training to adopt unfamiliar technologies, many working from home in less-than-ideal conditions.

One notable effect of the pandemic on higher education administration was the impact on the efforts to maintain quality instruction and accreditation as entire programs were moved to remote learning without adequate planning. The fledgling online programs resorted to versions of distance learning that did not go through the rigors of quality assurance for developing well-prepared online courses. Since travels were limited, the functions of the accrediting bodies were equally affected.

While some higher education institutions choose to follow paths other than regional accreditation to demonstrate quality in their programs, there is proven value and accruing benefit of accreditation. This paper examines the related issues of quality and accreditation of DE programs in higher education institutions, explores the role of the accreditation agencies in evaluating those programs, and offers a reflective and predictive view on the function of quality assurance of distance teaching and learning prior to, during, and in a post-COVID-19 era.

Accreditation

Over the years, higher education administrators have come to accept and value online courses as being equivalent to traditional classroom instruction (Bowers & Kumar, 2015; Holmes & Reid, 2017; Xu & Jaggars, 2013). DE has become a vital element of many institutions' strategic plans to increase enrollment, expand and assure access and opportunity to obtain a college education, and provide flexibility to adult learners.

According to the 2018 National Center for Education Statistics, the number of students enrolled in at least one online course increased from 10% in 1999 to 24% in 2008 (NCES, 2018). Nearly six million students were enrolled in at least one distance-learning course in 2015; almost half of them (48%) were in programs that were exclusively online (Allen & Seaman, 2017; NCES, 2018). Between fall 2015 and fall 2016, the number of students taking at least one distance learning course grew by 5.6% to 6,359,121, or to 31.6% of all students (OLC, 2021). While most online courses and programs were offered by a limited number of schools, new programs are in development at many colleges and universities as they look for creative ways to attract students (Allen & Seaman, 2017).

So, what constitutes quality in DE? What are the best ways to assess quality in this new delivery environment? How can the varying products and delivery systems of DE be accredited? Students taking DE courses or enrolled in DE degree-granting programs frequently grapple with these questions of institutional recognition, the quality of the programs and courses, potential transferability of earned credits, and the acceptance of their academic credentials by employers. Their concerns are also a reflection of accreditation. Similarly, administrators and faculty who are new to online learning wonder about issues of quality and accreditation in online learning.

Because quality and reputation are important value indicators for students, one of the ways that institutions demonstrate their achievement of quality is through accreditation. Though higher education institutions engage in the accreditation process voluntarily, an institution that is not accredited risks damaging its reputation, denies its students the privilege of attending an accredited institution, impedes the institution's recruitment efforts, and prevents graduates of professional programs from sitting for national licensure examinations.

Different accrediting agencies take varying approaches to their evaluation and accreditation of DE programs. The Accrediting Commission of Career Schools and Colleges (ACCSC), the Commission on Accrediting of the Association of Theological Schools (ATS), and the Accrediting Commission of the Distance Education Accrediting Commission (DEAC) (formally Distance Education and Training Council) adopted DE-specific standards. The Accrediting Council for Continuing Education and Training (ACCET), the regional accrediting agencies, and various DE professional organizations have developed guidelines that accreditation reviewers of DE programs can use to evaluate compliance with the course and program standards.

The Higher Learning Commission (HLC) established conditions for accreditation: "The institution's program quality and learning goals are consistent across all modes of delivery and all locations (on the main campus, at additional locations, by distance delivery, as dual credit, through contractual or consortial arrangements, or any other modality" (HLC, 2019). In the wake of the pandemic, the accreditation agencies' peer review teams are still challenged to conduct evaluations that will determine if an institution has met the HLC's Criteria for Accreditation (HLC, 2020a). Evaluations focus on an institution's history and seeking a consistent pattern of compliance with the HLC criteria, which include financial, operational, teaching and learning, governance, planning, institutional effectiveness, and assessment issues. Peer review teams look for evidence that the challenges institutions currently face due to the pandemic are atypical and impermanent. If an institution does not meet the standards, the team considers the wider context and effect of the institution's need to respond to the pandemic in a way that will satisfy the HLC accreditation criterion. Two criticisms accreditors frequently level against online learning is that many programs do not provide students learning at a distance the kind of support systems available to campus-based students and that online students have limited options to collaborate or network with other students and faculty members (Kristoffersen, 2019).

Distance Education Accreditation

Background

Just like conventional face-to-face campus instruction, DE programs need to be accredited. Under the direction of the U.S. Department of Education (USDE), accrediting agencies use well-established criteria to monitor the quality of institutions of higher education, including DE programs (USDE, n.d.). Distance learning programs can be accredited by recognized regional or national accrediting agencies, the Distance Education Accrediting Commission (DEAC), or the Accrediting Commission of Career Schools and Colleges (ACCSC). It is worth noting that while degree programs from institutions accredited by DEAC are acceptable to many employers, some regionally accredited institutions do not accept the transfer of credits from programs or institutions that only have the DEAC accreditation.

It is important to recognize that the need to establish standards and maintain quality in distance education dates to the correspondence school era (DEAC, 2021). DEAC was established as a non-profit national educational accreditation agency and trade association to promote excellent educational standards and maintain sound ethical traditions of correspondence schools. The DEAC was founded in 1926 as the National Home Study Council (NHSC), renamed the Distance Education and Training Council in 1994, and in 2015 changed to its present name. The DEAC was established as a follow-up to the Carnegie Corporation study in 1924 that reported the need for quality standards among correspondence schools to avoid fraud and ensure that the interests of correspondence schools' students were protected (Moore & Anderson, 2003). The DEAC has accredited 51% or more of the DE programs and institutions (CHEA, 2010).

In 1959, DEAC (then NHSC) received formal recognition by the USDE as an accreditor of higher education institutions and from the Council for Higher Education Accreditation (CHEA). The DEAC distance education member institutions number more than 100 in 21 U.S. states and seven foreign countries; they include non-profits, trade associations, for-profit companies, for-profit educational institutions, and military entities that utilize distance learning or correspondence instructional modes in their delivery of degree and non-degree education (DEAC, 2021).

DEAC's accreditation scope extends to institutions ranging from secondary schools to professional and doctoral degree-granting institutions. With the evolution of DE and the emerging trends resulting from developments in technology, the DEAC has kept up with changes and made relevant modifications. For instance, the DEAC initially accredited single-mode institutions that delivered instruction at a distance, but with time it included dual-mode institutions that offered DE and traditional face-to-face instruction, a change prompted by the increasing number of dual-mode institutions. DEAC accreditation is voluntary and is indicative of institutional quality improvement. Its accrediting efforts are more narrowly focused on DE programs than regional or programmatic accrediting agencies. The DEAC accreditation does not qualify institutions to receive federal financial aid. The DEAC accreditation criteria and standards take institutions along a path that encourages quality education and excellent practices.

Accreditation of distance learning programs
For over two decades, the principal accreditors of U.S. institutions have included DE in formulating standards and processes, recognizing early on that DE is a distinct instructional delivery mode that necessitates distinctive reporting guidelines. An institution may be accredited by a regional agency seeking to assure continuity of high educational standards for one or more specialized programs. Programmatic accreditation is sought by institutions with on-campus or DE academic programs that have already been accredited by one of the regional agencies.

Regional accreditation agencies
The Council of Regional Accrediting Commissions' (C-RAC) organizations accredit over 3,000 colleges and universities in the United States (C-RAC, 2018). The commission is comprised of seven regional organizations (C-RAC, 2020a):

- Accrediting Commission for Community and Junior Colleges (ACCJC)
- Higher Learning Commission (HLC)
- Middle States Commission on Higher Education (MSCHE)
- New England Commission of Higher Education (NECHE)
- Northwest Commission on Colleges and Universities
- Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)
- WASC Senior College and University Commission

These agencies are authorized to grant accreditations by the United States Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA). Each of the seven agencies determines the criteria that they will use in evaluating institutions. C-RAC accomplishes regional accreditation functions as member organizations conduct peer reviews to assess the educational quality and instructional delivery methods found at higher education institutions (C-RAC, 2020b). They established guidelines in 2009 that were used to evaluate online learning. Among other requirements, the guidelines stipulated that institutions needed to demonstrate how online learning fits into the institutional mission and how financial and technological resources will enable the success of online instruction (HLC, 2009).

The Accrediting Commission for Community and Junior Colleges grants accreditation to private and public *colleges* that offer two-year education programs and grant associate degrees. Their scope extends to colleges in California, Hawaii, and American territories and protectorates located in the Pacific Ocean (ACCJC, 2021).

Higher education institutions recognize that employers have a profound interest in regional accreditation; hence, they make every effort to obtain it. Regional accreditation can be granted to public, private, faith-based, and two- and four-year degree-granting non-profit institutions, including graduate programs. In some instances, accreditation is extended to for-profit degree-granting institutions. The regional accreditation agencies do not accredit academic programs of individual colleges or schools within a university or academic programs of an institution, which would affirm that all the academic offerings meet accreditation standards (Robinson, 2004). The rigorous review process and accreditation assure employers and other academic institutions that the credits and degrees issued by accredited institutions are of high quality. With the increasing acceptance and prominence of DE programs in conventional accredited institutions, the regional agencies have ramped up efforts to develop standards for DE program reviewers. The USDE removed the distinction between regional and national accreditors, and since 2019 has assessed the effect of that change on how DE is treated in the accreditation process.

Regional accrediting agencies and distance education programs

In recognition of the unique environment of DE programs and the need to provide a common platform for understanding and determining quality in distance teaching and learning, in 2001, the regional accrediting agencies teamed up with the Western Cooperative for Education Telecommunications (WCET) to develop "Best Practices for Electronically Offered Degree and Certificate Programs," (WCET, 2009) a document later revised in 2006. The Best Practices paper was based on a document originally developed by the Western Interstate Commission for Higher Education (WICHE, 2018). The Best Practices document was developed to help colleges and universities plan DE programs, offer a structure for self-assessment in the evaluation of their DE programs, and provide guidelines for standardization. The best practices provided regional accrediting agencies with a general knowledge of and assessment criteria for DE programs, which enabled evaluation policies and processes that apply to each of the six regions represented by the accrediting agencies. Five major areas are addressed by the Best Practices document:

- Institutional Context and Commitment
- Curriculum and Instruction
- Faculty Support
- Student Support
- Evaluation and Assessment

Each of these five areas is documented with the conditions, requirements, quality concerns, and questions that institutions should address when engaging in DE.

National accreditation of distance education programs

The national accrediting agencies accredit institutions nationwide and worldwide in some cases. While national accreditation is recognized and respected by the USDE and CHEA, some regionally accredited institutions may be reluctant to recognize credits from nationally accredited colleges and universities. This is because regional accreditation denotes quality. Additionally, national accreditations are not considered to have rigorous standards for certain criteria such as faculty qualifications and library resources. Therefore, students who plan to transfer credits from a nationally accredited institution to a regionally accredited institution must first verify that the regionally accredited institution will accept the credits. Two national agencies that accredit distance education programs are the Accrediting Commission of Career Schools and Colleges (ACCSC) and the Distance Education Accrediting Commission (DEAC), both of which are USDE recognized non-profit organizations that only accredit institutions that offer most of their courses at a distance.
Most for-profit, specialized, and nontraditional institutions that offer DE programs are accredited by one or more of the national accrediting agencies. *National accreditation focuses* largely on for-profit institutions *that have a specific mission (*e.g., nursing, education, law, technologies) *or unique delivery system (*e.g., synchronous or asynchronous DE programs).Nationally accredited institutions, whether public or private, fall into three broad categories: faith-related (religious colleges), career-related (*technical and vocational colleges), and institutions that engage solely in DE.*

Programmatic accreditation

Programmatic accreditation, also referred to as specialized or professional accreditation, is granted to departments, programs, colleges, or schools within a college or university that have already received regional or national accreditation. Programmatic accreditation certifies that the graduates from identified academic disciplines meet professional licensure requirements of professional associations' state or national licensing boards. This highly valued type of accreditation status recognizes specific academic disciplines (e.g., pharmacy, medicine, engineering, business, nursing, law, social work, and education). As of March 2017, about 66 recognized programmatic accrediting agencies accredited over 19,400 programs (CHEA, 2020b). DE programs are included in the programmatic accreditation process.

Many accredited institutions seek programmatic accreditation to assure applicants of the quality of their professional programs, including their DE offerings. Prospective students who are considering enrolling in a DE program associated with a professional field should give special consideration to an institution whose programmatic accreditation will advance their future careers.

Quality and Accreditation

The purpose of accreditation is to guarantee the quality of education, enable course credit and program transfers between institutions of higher education, provide access to federal funds for students, and instill confidence in an institution among its constituencies (Eaton, 2002). A well-designed online course is comparable to, and some would argue more effective than, face-to-face classroom instruction, as it requires an elaborately designed process, affords students opportunities for interaction and collaboration, integrates multimedia and technology well, and provides flexibility, which enables students to achieve superior results and satisfaction (Bowers & Kumar, 2015; Holmes & Reid, 2017; Xu & Jaggars, 2013).

Assurance of DE quality continues to fuel a heated dialog among higher education constituencies, elected officials, the general public, and stakeholders who have differing, sometimes opposing, interests and interpretations of quality (Mariasingam, 2005; Parker, 2003). DE quality was originally defined as comparable to the practices of conventional campus-based programs. However, Cavanaugh (2002) argues that it is time to redefine DE quality, given its technology-dependent delivery systems within a learning environment marked by geographical separation. The active interest of accrediting agencies and DE professional associations, in partnership with academic institutions, continues to pursue prototypes that will accurately define DE quality, identify comprehensive standards, and develop evaluation processes. The work of organizations such as Quality Matters (QM) and Online Learning Consortium (OLC) provide quality guidelines that contribute to those efforts. The existing guidelines and criteria provided by the DEAC and the regional and programmatic accrediting agencies assure quality and accredit higher education institutions' DE efforts.

Efforts to achieve DE quality

The evidence of an institution's commitment to DE goes beyond offering quality courses. To provide acceptable, high-quality programs, institutions need to show commitment to achieving a level of excellence comparable to the quality, integrity, student support, and effectiveness evident in their traditional campus instruction. Benchmarking against stellar DE programs to gain from their exemplary practices or conferring with recognized accrediting agencies are helpful practices (Merisotis & Phipps, 2000; Novak, 2002).

In addition to the WCET Best Practices document (WCET, 2009), the U.S. regional accrediting commissions prepared two documents: "Best Practices for

Electronically Offered Degree and Certificate Programs" and "Statement of Commitment by the Regional Accrediting Commissions for the Evaluation of Electronically Offered Degree and Certificate Programs" (MSCHE, 2002). Adopted in March 2001, these documents demonstrate the commitment of the regional accrediting agencies to encouraging excellent practices in distance education, including the importance of standardization in the accreditation process of DE programs. These documents, however, are not the endpoint of efforts to improve the evaluation of DE quality. Rather, they represent the beginning phase of endeavors to promote quality standards in a new and evolving field. It is not yet clear how institutions will use these working documents as authoritative and consistent evaluation guidelines to measure the achievement of the required standards for single-mode and dual-mode DE programs or web-enhanced courses. As described in the *Best Practices* document, such efforts are still a work in progress. The disruption and altered forms of online learning following the emergency remote instruction caused by the coronavirus pandemic is a clear indication that more changes are forthcoming to meet the challenges of emerging practices in the evolution of distance education.

When considering the improvement or development of quality online learning courses and programs, the use of current quality standards established by different organizations can be helpful. Some of these include quality metrics from the Online Learning Consortium (OLC) Quality Scorecard (OLC, 2019), Quality Matters rubrics (QM, 2021), or the University Professional and Continuing Education Association's Hallmarks of Excellence in Online Leadership (UPCEA, 2021a). OLC is structured as a membership resource organization that was established to improve quality in online teaching and learning. QM provides resources for examining student learning outcomes, student retention, establishing connections between design and learning, effectively sustaining quality, and adhering to accreditation standards (Adair & Shattuck, 2015; Hollowell, Brooks & Anderson, 2017; Martin, Ndoye, & Wilkins, 2016). UPCEA "serves its members with innovative conferences and specialty seminars, research and benchmarking information, professional networking opportunities, and timely publications" (UPCEA, 2021b). Efforts by these organizations provide useful benchmarking tools, checklists, and rubrics for faculty and course developers.

Several accrediting agencies employ evidence-based methods to establish standards and evaluation criteria for institutional accreditations. To accomplish this, evaluation criteria, checklists, and commissions rely on proven quality frameworks and guidelines such as the Quality Matters framework (Delva et al., 2019). The DEAC accreditation handbook specifies relevant criteria for online learning, such as having sufficient design and delivery of materials with readily available and reliable technology (DEAC, 2019). The HLC established conditions for accreditation: "The institution's program quality and learning goals are consistent across all modes of delivery and all locations (on the main campus, at additional locations, by distance delivery, as dual credit, through contractual or consortial arrangements, or any other modality" (HLC, 2019).

Disruptions by the Pandemic

The spring 2020 COVID-19 pandemic elicited a hastened response that drove higher education to incorporate online learning on a large scale as a necessity and convenience to continue to serve students. This swift switch to remote work and learning led to significant changes (Downs, 2020). The pandemic disrupted higher education operations, forcing institutions to deliver courses online that would enable students to continue their studies and practicum or internships and allow final-year students to graduate without adequate preparation for students and faculty. The urgent nature of the pandemic did not permit the normal process of developing online courses to assure quality instruction. Institutions made rapid and significant changes that, under the circumstances, could not include training that would have been a normal procedure for administrators, faculty, and students. With the switch in full swing, it was essential for higher education institutions to change direction immediately, anticipating a future that could depend on online learning. (Downs, 2020). The pandemic affected the accreditation processes and disrupted the implementation of quality measures for courses that were not previously designed for online instruction but were rapidly converted for virtual delivery. The nature of that response did not allow institutions time to confer with the accrediting agencies.

As the pandemic continued unabated, the C-RAC members unanimously agreed to measures developed to assure the continued delivery and quality evaluation of online courses. In April of 2020, Federal Student Aid, an office of the U.S. Department of Education, provided broad approval of the use of digital technologies to provide instruction, bypassing the department's normal channels of compliance. That approval was authorized as a temporary waiver; institutions that had not gone through the standard approval process previously but wanted to offer online programs beyond the stipulated waiver period would be required to go through the standard approval process, meeting the applicable policies and procedures of the accrediting agency in order to be in compliance with the department's standards (O'Keefe et al., 2020).

Accreditors worked under the direction of the USDE, which provided them the grounds by which some requirements for institutions could be waived, such as conditions to permit institutions to switch to distance education and to allow accrediting agencies to perform the site visits virtually. The USDE guidance to accrediting agencies released in March of 2020 included the flexibility to bypass public comment periods and adoption by full agency membership, which has enabled accreditors to develop and adopt temporary policies as they navigate the challenges of the pandemic (Dasher-Alston et al., 2020; USDE, 2021).

The USDE made certain pandemic-related accommodations for higher education accreditors. For instance, they were allowed to ignore the DE review requirements for institutions with plans to deliver distance education programs for students who were unable to attend classes on campus due to the pandemic, and they were authorized to perform virtual site visits. Accreditors endeavored to provide support and guidance on how to navigate the challenges related to the potential spread of COVID-19 as campuses reduced or suspended face-to-face instruction entirely. Institutions were encouraged to inform their accreditors of the changes they have made to continue instruction, support students, and ensure quality.

When the HLC board of directors realized in the spring of 2020 that the move to DE for almost all institutions would be a new reality and a deviation from the norm, they took rapid measures to approve temporary emergency policies that enabled the leadership to provide opportunities for institutions to address the challenges posed by the developing pandemic. The pandemic had struck at a critical time in the agency's schedule because it was at the height of the spring evaluation season, during which over sixty institutions had been slated for peer review team visits (Downs, 2020). Many reviewers come from institutions that were closed and had imposed travel restrictions on their faculty and employees, just as most campuses scheduled for review were closed to visitors as faculty and employees worked remotely. To assure continuity of operation, HLC decided to institute and implement virtual evaluations conducted by peer reviewers using innovative evaluation methods with the understanding that follow-up visits would be scheduled as soon the travel bans were lifted. The reviewers' long-term travel schedules were prepared to ensure the availability of a sufficient number of peer reviewers within the entire year. Unfortunately, the pandemic was not as short-lived as had been anticipated (Downs, 2020).

Only a few institutions requested waivers. Of the nearly 970 member institutions, only 16% requested waivers, and those requests were granted. The majority of schools that received the waivers were comprised of small, rural institutions with poor connectivity problems, institutions offering specialized residential programs, and single-purpose institutions offering experiential programs. An even smaller number of institutions (5%) did not request waivers, specifying that they did not intend to deviate from their existing level of distance education approvals.

In the summer of 2020, HLC issued new guidelines that permitted institutions to request waivers that would expire on December 31, 2020 (HLC, 2020b). Qualifying institutions were required to show that they were committed to maintaining features of distance education quality as established on the HLC website. The institutions that completed a virtual evaluation during the spring of 2020 were eligible to take part in a verification visit. The comprehensive evaluations that were planned for the fall of 2020 were conducted virtually by most of the review teams. Where it was not possible for reviewers to go to the campuses, HLC extended the verification visit protocol to consider rescheduling the visits during the spring of 2021.

Beyond the Pandemic
To continue to maintain the highest standards in postsecondary education, colleges and universities to reflect on the following questions and assess whether they are in compliance with their respective accreditation agencies' DE policies and if they are incorporating quality measures post-COVID-19.

- Will faculty members receive appropriate training to qualify them to develop, design, and teach or administer DE courses or programs?
- Is there an institution-wide assessment system in place to evaluate the extent to which an institution is achieving the goals aligned with its mission when compared with campus-based programs and courses? Are those assessment results being used to improve online education? Is there evidence of improvement based on analysis of the assessment results?
- The emergency remote deployment of online courses increased awareness that the digital divide is widening for underserved and disadvantaged students. Will there be a plan in place for all enrolled students to have uninterrupted access to the internet? Will they have the technology necessary to benefit from online learning, succeed academically, and access campus resources? Will they have access to technology support and staff who are prepared to help them use the technology required by their institution's DE platform?
- Will institutions begin to develop and provide support services to online students that are equivalent to those offered to on-campus students?
- Will the emergency-related online teaching and learning strategies become the norm in post-COVID-19? How do institutions assure standards that comply with their accreditation status in the post-COVID-19 era?
- Will institutions lose funds due to the decrease in government funding and a possible decline in student enrollment related to the spread of the COVID-19 virus, and how will such a financial loss affect their accreditation? If institutions become financially insolvent, will they still be accredited?
- Given the CDC efforts to track person-to-person contagion, is there a compelling interest in adding a "Data Policy Standard" to accreditation criteria to address standards of personal privacy and security and data retention, protection in transit, disposal, and ownership?

Institutions and accrediting agencies need to put measures in place to respond quickly and successfully when the unthinkable happens. A lesson from the pandemic is to be prepared for any emergencies or sudden disruption in service. The efforts of the USDE, HLC, CHEA, and C-RAC to reach out to institutions during the pandemic are indicative of their interest in the continuity of instruction during a global emergency, interest in maintaining quality, and determination to reassure institutions of their support. It also revealed the obvious issues plaguing the creation of concrete plans, namely the indeterminate nature of how long the pandemic would keep campuses closed, the type of training that faculty and students would need to flourish in distance learning, what the credit hour will look like in the future as institutions ponder the changes resulting from the disruptions, and the long-term effect closures would have for students, faculty, administrators, and other internal and external constituencies.

Each of the seven accreditation agencies has COVID-19 responses and updates on their websites.

- Accrediting Commission for Community and Junior Colleges: https://accjc.org/covid-19/
- New England Commission of Higher Education: https://www.neche.org/covid-19-update/
- Higher Learning Commission: https://www.hlcommission.org/Policies/covid-19-temporary-emergency-policy.html?highlight=WyJjb3ZpZCJd
- Middle States Commission on Higher Education: https://www.msche.org/covid-19/
- Northwest Commission on Colleges and Universities: https://nwccu.org/home/covid-19/
- Southern Association of Colleges and Schools Commission on Colleges: https://sacscoc.org/?s=covid
- Western Association of Schools and Colleges Senior College and University Commission: https://www.wscuc.org/covid-19

The premise of accreditation is the process of peer-review where the bulk of the accrediting commission members or those that decide the status of accreditation are faculty and administrators from other institutions. With the travel limits in place due to the 2020 pandemic, reviewers resorted to virtual visits. Were those reviewers able to thoroughly accomplish their tasks? Will the video conferencing format be sufficient? Also, the notion of colleagues reviewing colleagues, which has been a long-standing practice in accreditation evaluations, raises concerns as some people perceive the potential for conflicts of interest or opening doors to favoritism. Since this is a process that serves an important gatekeeping role for setting quality standards in instruction and gaining access to huge sums of money in federal aid, should a different independent process be instituted?

Conclusion

DE accreditation provides evidence of the high quality of a program and enables institutions and students to benefit from government funding. DE programs require equal amounts of academic rigor and equivalent access to the support available to students in traditional face-to-face learning environments. Institutions developing DE programs need to be familiar with accreditation standards and conversant with the assessment strategies necessary to adapt and maintain those standards within an evolving academic context. Accrediting organizations can help meet those challenges.

As accreditation agencies establish criteria to assess and assure delivery of commensurate educational opportunities, they need to review and revise standards from time to time to incorporate the impact of new technologies and platforms as they are introduced. Institutions need to respond to new standards set by the accrediting agencies, continually assessing DE programs and courses, and making necessary revisions to ensure the consistent improvement of content and delivery. Students need to understand the importance of verifying that the institution they plan to attend has been accredited by a recognized accrediting agency.

As DE continues to evolve, higher education institutions will face challenges as they pursue quality in designing, developing, and delivering DE programs that reflect the nature of online teaching and the learning experience.

The 2020 pandemic has given accreditation agencies and institutions a formidable challenge: the impetus to engineering new, more sustainable, outcomes-based models to achieve and maintain standards in higher education DE programs. A lesson from the pandemic is to prepare for emergencies that result in sudden disruption in service. This paper is offered as a primer for a reflective view on reimagining DE quality assurance in higher education in a post-COVID-19 era.

References

ACCJC (Accrediting Commission for Community and Junior Colleges. (2021). *Checklist for evaluating compliance with federal regulations and related commission policies*. Retrieved from https://accjc.org/wp-content/uploads/Checklist-for-Evaluating-Compliance-Jul15.pdf

ACE (American Council on Education). (1996). *Quality on the line*. Washington, DC: The Institute for Higher Education. Retrieved from http://www.ihep.org/sites/default/files/uploads/docs/pubs/qualityontheline.pdf

Adair, D., & Shattuck, K., (2015). Quality matters TM: An educational input in an ongoing design-based research project. *American Journal of Distance Education*, *29*(3), 159–165.

Allen, I. E., & Seaman, J. (2017). *Digital learning compass: Distance education enrollment report 2017*. Babson Survey Research Group. Retrieved from https://www.bayviewanalytics.com/reports/digtiallearningcompassenrollment2017.pdf

Bowers, J., & Kumar, P. (2015). Students' perceptions of teaching and social presence: A comparative analysis of face-to-face and online learning environments. *International Journal of Web-Based Learning and Teaching Technologies*, *10*(1), 27–44.

Cavanaugh, C. (2002). *Distance education quality: Success factors for resources, practices and results*. Ideal Group.

CHEA (Council for Higher Education Accreditation). (2002) *Specialized accreditation and assuring quality in distance learning*. *CHEA Monograph Series 2002*(2),3.

CHEA (Council for Higher Education Accreditation). (2010). *Distance education accrediting commission (DEAC)*. Retrieved from https://www.chea.org/distance-education-accrediting-commission

CHEA (Council for Higher Education Accreditation). (2020a). *Regional accrediting organizations 2020-21*. Retrieved from https://www.chea.org/regional-accrediting-organizations

CHEA (Council for Higher Education Accreditation). (2020b). *CHEA–recognized accrediting organizations*. Retrieved from https://www.chea.org/chea-recognized-organizations

C-RAC (Council of Regional Accrediting Commissions). (2018). *Council of Regional Accrediting Commissions*. Retrieved from https://www.c-rac.org/

C-RAC (Council of Regional Accrediting Commissions). (2020a). *C-RAC members*. https://www.c-rac.org/key-contacts

C-RAC (Council of Regional Accrediting Commissions). (2020b). *About us: Who we are*. Retrieved from https://www.c-rac.org/about-us

Dasher-Alston, R., May, N. H,. & Shelby, C. (2020). Managing COVID-19 Disruption: Accrediting Agencies Adopt Temporary Measures to Address Challenges. *CooleyED: Education Policy, Technology and Business*.https://ed.cooley.com/2020/04/06/managing-covid-19-disruption-accrediting-agencies-adopt-temporary-measures-to-address-challenges/

DEAC (Distance Education Accrediting Commission). (2021). *DEAC history*. Retrieved from https://www.deac.org/Discover-DEAC/DEAC-History.aspx

Delva, S., Nkimbeng, M., Chow, S., Renda, S., Han, H. R., & D'Aoust, R. (2019). Views of regulatory authorities on standards to assure quality in online nursing education. *Nursing Outlook*, *67*(6), 747–759. https://www.sciencedirect.com/science/article/pii/S0029655419300673

Downs, L. R. (2020). Institutional accreditation in the midst of COVID-19. *WCET Frontiers*. Retrieved from https://wcetfrontiers.org/2020/11/06/institutional-accreditation-in-midst-of-covid19/

Eaton, J. S., American Council on Education, & EDUCAUSE. (2002). *Maintaining the delicate balance: Distance learning, higher education accreditation, and the politics of self-regulation*. Washington, DC: American Council on Education. Retrieved from https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.125.5100&rep=rep1&type=pdf

HLC (Higher Learning Commission). (2019). *Quality initiative*. Retrieved from https://www.hlcommission.org/Accreditation/quality-initiative.html

HLC (Higher Learning Commission). (2020a). *Policy Title: Criteria for Accreditation*. Retrieved from https://www.hlcommission.org/Policies/criteria-and-core-components.html

HLC (Higher Learning Commission). (2020b). *Guidelines for the evaluation of distance education*. Retrieved from https://www.neche.org/wp-content/uploads/2018/12/Pp90-Guidelines_for_the_Evaluation_of_Distance_Education_On_line_Learning.pdf

Hollowell, G. P., Brooks, R. M., & Anderson, Y. B., (2017). Course design, quality matters training, and student outcomes. *American Journal of Distance Education, 31*(3), 207-216.

Holmes, C. M., & Reid, C. (2017). A comparison study of on-campus and online learning outcomes for a research methods course. *The Journal of Counselor Preparation and Supervision*, *9*(2). http://dx.doi.org/10.7729/92.1182

Kristoffersen, D. (2019). *Quality assurance and public accountability*. Council for Higher Education Accreditation: CHEA Conference January 29-30, 2019, Washington DC. Retrieved from https://www.chea.org/sites/default/files/presentations/Kristoffersen.pdf

Mariasingam, M. (2005). *Quality criteria and benchmarks for online degree programs* [Doctoral dissertation, University of Wisconsin–Madison].

Martin, F., Ndoye, A., & Wilkins, P. (2016). Using learning analytics to enhance student learning in online courses based on quality matters standards. *Journal of Educational Technology Systems*, *45*(2), 165–187.

Merisotis, J. P., & Phipps, R. A. (2000). *Quality on the line: Benchmarks for success in internet-based distance education*. Washington, DC: The Institute for Higher Education Policy. Retrieved from https://eric.ed.gov/?id=ED444407

Moore, M. G., & Anderson, W. G. (2003). *Handbook of distance education*. Lawrence Erlbaum Associates.

MSCHE (Middle States Commission on Higher Education). (2002). *Distance learning programs: Interregional guidelines for electronically offered degree and certificate programs*. Philadelphia, PA: Middle States Commission on Higher Education. Retrieved from https://files.eric.ed.gov/fulltext/ED468791.pdf

NCES (National Center for Education Statistics). (2018). *Digest of education statistics, 2016*. Retrieved from https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2017094

Novak, R. J. (2002). Benchmarking distance education. *New Directions for Higher Education, 118*, 79-92.

O'Keefe, L., Rafferty, J., Gunder, A., & Vignare, K. (2020, May 18). Delivering high-quality instruction online in response to COVID-19: Faculty playbook. https://www.everylearnereverywhere.org/resources/delivering-high-quality-instruction-online-in-response-to-covid-19/

OLC (Online Learning Consortium). (2019). *Advancing quality and leadership in digital education*. Retrieved from https://onlinelearningconsortium.org/about/olc-2/

OLC (Online Learning Consortium). (2021). *Grade increase: Tracking distance education in the United States*. Retrieved from https://onlinelearningconsortium.org/read/grade-increase-tracking-distance-education-united-states/

Parker, A. (2003). Identifying predictors of academic persistence in distance education. *USDLA Journal, 17*(1), 55–62.

Parker, K., Lenhart., A., & Moore, A. (2013). *The digital revolution and higher education: College presidents, public differ on value of online learning*. Retrieved from https://www.researchgate.net/publication/234655211_The_Digital_Revolution_and_Higher_Education_College_Presidents_Public_Differ_on_Value_of_Online_Lear

QM (Quality Matters). (n.d.a). *Framework that supports a QM Culture*. Retrieved from https://www.qualitymatters.org/qa-resources/resource-center/conference-presentations/framework-supports-qm-culture

QM (Quality Matters). (n.d.b). *QM rubrics and standards*. Retrieved from https://www.qualitymatters.org/qa-resources/rubric-standards

Robinson, E. T. (2004). Accreditation of distance education programs: A primer. *American Journal of Pharmaceutical Education; 68*(4), 1-5. Retrieved from http://archive.ajpe.org/aj6804/aj680495/aj680495.pdf

SACS-COC (Southern Association of Colleges and Schools Commission on Colleges). (2020). *Distance education and correspondence courses: Policy statement*. Retrieved from https://sacscoc.org/app/uploads/2019/07/DistanceCorrespondenceEducation.pdf

UPCEA (University Professional and Continuing Education Association). (2021a). *UPCEA Hallmarks of Excellence in Online Leadership*. Retrieved from https://upcea.edu/resources/hallmarks-online/

UPCEA (University Professional and Continuing Education Association). (2021b). *About UPCEA*. Retrieved from https://upcea.edu/about/

USDE (U.S. Department of Education). (n.d.). *Accreditation: Postsecondary Education Institutions*. Retrieved from https://www.ed.gov/accreditation

USDE (U.S. Department of Education). (2021). *Accreditation in the United States*. Retrieved from https://www2.ed.gov/admins/finaid/accred/accreditation_pg10.html

WCET (Western Cooperative for Educational Telecommunication). (2009). *Best practices for electronically offered degree and certificate programs*. Retrieved from https://wcet.wiche.edu/sites/default/files/docs/resources/Best-Practices-Promote-Academic-Integrity-2009.pdf

WCET (Western Cooperative for Educational Telecommunication). (2020). *Regional accrediting agency documents on electronically offered degree and certificate programs*. Retrieved from http://www.wcet.info/resources/accreditation/

WICHE (Western Interstate Commission for Higher Education). (2018). *About us*. Retrieved from https://www.wiche.edu/about

Xu, D., & Jaggars, S. S. (2013). *Adaptability to online learning: Differences across types of students and academic subject areas*. CCRC Working Paper No. 54. New York, NY: Columbia University, Teachers College, Community College Research Center. https://ccrc.tc.columbia.edu/media/k2/attachments/adaptability-to-online-learning.pdf

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