Date: September 10, 2020

To: CEOs, ALOs, and Team Chairs of Colleges being reviewed in Spring 2021

From: Stephanie Droker, Ed.D.

Subject: Temporary Provision for review of Distance Education courses in response to the COVID-19 pandemic for colleges being reviewed in Spring 2021

In an effort to assist with the review of Distance Education courses as part of a peer review visit during Spring 2021, ACCJC has developed temporary provisions for the review of Distance Education courses.

ACCJC upholds its commitment to academic quality and continuous improvement. At the same time, ACCJC recognizes the challenges colleges have faced, because of COVID-19, with rapidly moving instructional courses into the distance education modality. ACCJC is also aware of the likelihood that many of these courses, which have adapted quickly for the distance education modality, will go back to being offered only in the face-to-face modality as soon as permitted.

In light of these circumstances, the review of Distance Education courses, as part of a Spring 2021 visit, will occur in two separate cohorts:

1) Courses previously approved to be taught 100% online for the distance education modality prior to COVID-19 that would normally be scheduled as a distance education course; and

2) All other distance education courses offered 100% online in the distance education modality as part of the college’s response to COVID-19.

The review of two separate cohorts will allow peer-reviewers to target any possible recommendations to a particular cohort of courses, which will better assist the college with the most effective and appropriate response. This temporary provision for review of Distance Education courses in two separate cohorts only applies to visits occurring during Spring 2021.

If you have any questions please contact your ACCJC staff liaison. Thank you for your ongoing commitment and service to academic quality and excellence.
1. Preparation for Comprehensive or Follow-up Peer Review Visit During Spring 2021

ACCJC upholds its commitment to academic quality and continuous improvement. At the same time, ACCJC recognizes the challenges colleges have faced, because of COVID-19, with rapidly moving instructional courses into the distance education modality. ACCJC is also aware of the likelihood that many of these courses, which have adapted quickly for the distance education modality, will go back to being offered only in the face-to-face modality as soon as permitted. In light of these circumstances, the review of Distance Education courses as part of a Spring 2021 visit will occur in two separate cohorts:

1) Courses previously approved to be taught 100% online for the distance education modality prior to COVID-19 that would normally be scheduled as a distance education course; and

2) All other distance education courses offered 100% online in the distance education modality as part of the college’s response to COVID-19.

The review of distance education courses in each cohort should follow the provisions outlined below.

- The college should inform distance education faculty that the peer review team will “observe” a randomly selected group of distance education classes from the semester prior to the team visit.
- The college should work with the team chair regarding the random selection of fully online distance education classes to observe. The college should select no fewer than 15 separate course sections but no more than 10% of the total number of distance education course sections offered in one semester, not to exceed a maximum of 50. The college will provide peer reviewers with access to archived distance education classes from the semester immediately preceding the semester of the visit, affording them the opportunity to observe “regular and substantive” interaction through a full semester, quarter, or shortened term. Review of archived classes also ensures that the reviewers’ presence in the online class will not interfere with the instruction or the course design.
- The college should inform the peer review team of instructions for access to the randomly selected classes.
- The college should expect that the peer review team will maintain confidentiality of student and instructor information.

2. Guidelines for Peer Reviewers

- The team chair will appoint one or two team members to observe distance education classes.
• The peer reviewers will observe no fewer than 15 separate fully online distance education course sections but no more than 10% of the total number of online course sections offered in a semester, not to exceed a maximum of 50.

• If the college provides access to archived online sections from the semester or quarter immediately preceding the visit, then the assigned team members will be able to conduct their observations of the courses as part of the desk review of the evidence prior to the actual visit. The reviewers will not need to spend time observing online classes during the visit. This is a preferred approach to online classroom observation.

• Peer reviewers should be allowed access as an instructor or teaching assistant so that they will be able to observe all facets of instructor interactions with students. Considering the sensitive nature of such observations and acting in accordance with the Commission Policy on Public Disclosure and Confidentiality in the Accreditation Process, the peer reviewers will maintain confidentiality throughout the observations and report writing.

• Peer reviewers will evaluate the courses using the institution’s own definitions and expectations for regular and substantive interaction.

• Peer reviewers will triangulate their findings by confirming their observations through interviews with faculty and students who participate in distance education, and with managers or administrators who oversee distance education, and by using those interviews to uncover the root of deficiencies that they may have found in their observations.

• In keeping with federal policy §602.17(g), peer reviewers should be able to ensure that effective student verification processes are being employed; that student privacy is protected; and that, if there are any additional charges for these services, the college has written policies that students will be notified of such charges at the time of registration or enrollment.

3. Considerations for Recommendations

The considerations for recommendations pertaining to distance education courses below, and any recommendations, will be applied independently to each cohort of courses under review as described above under the temporary provision for review of Distance Education courses in response to the COVID-19 pandemic.

• Determining if a recommendation is necessary, and the type of recommendation, compliance or improvement, will be based on the careful consideration of several factors. For example, if a team finds that less than half of the online classes observed demonstrated evidence of regular and substantive interaction, the team may want to review an additional sampling of courses to see if the same result is present. The team should also look at other factors, such as professional development, policies and procedures related to distance education, accountability measures to monitor and ensure regular and substantive interaction, and/or faculty awareness and understanding of the institution’s definition of regular and substantive contact. Ascertain the nature of the issue through consideration of all potential factors will inform the team members as they write an appropriate recommendation to assist the college in meeting or increasing effectiveness regarding standards and/or federal policy concerning distance education.
In considering recommendations, the team will clearly identify the Standards in which the institution is deficient. The team will also ensure that in the discussion of the findings for those Standards, the deficiency in distance education is specifically called out in the team report.

For instance, if the team finds that only 35% of the online classes observed had evidence of regular and substantive interaction, the team might write those findings in its discussion of Standard II.A.2, describing how the college is deficient in ensuring that “the content and methods of instruction meet generally accepted academic and professional standards.” The findings should also identify the issues, to the extent known, pertaining to this deficiency. Perhaps during interviews, the team finds that the college has not provided training to online instructors on best practices for regular and substantive contact in online instruction nor perhaps on how to operate the learning management system. The team might include this issue in its findings for Standard III.A.14, describing how the institution is deficient in providing professional development “consistent with the institutional mission and based on evolving pedagogy, technology, and learning needs.”

Determining recommendations related to distance education, whether for compliance or for improvement, should not be driven only by a low percentage of online classes with evidence of regular and substantive interaction. The team will explore through its interviews with members of the college community, including faculty, students, and administrators, and review of all evidence, the issues pertaining to the low percentage. It could be, if less than half of a college’s online classes demonstrate regular and substantive interaction, that the institution is experiencing challenges with one or more of the following: publishing or implementing policies and procedures related to distance education, ensuring professional development opportunities for online instructors, establishing accountability measures to monitor and ensure regular and substantive interaction, or embracing adjunct instructors in professional development and course development opportunities. The team will want to explore all these possible factors and document the challenges carefully in its findings, and write recommendations appropriate to the severity of the deficiencies.

In the final Team Report, the team must ensure that its responses to the checklist questions pertaining to the Policy on Distance Education and on Correspondence Education are consistent with its findings and recommendations in the body of the report.