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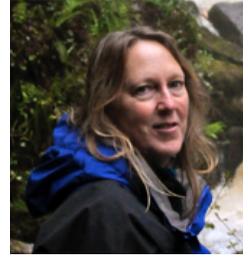
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The Intersection of Exemplar Professional Accreditation Standards and Quality Matters Rubric Standards for Best Practice in Distance Education



Nancy E. Krusen^A

The process of accreditation is a systematic review through which the public may be assured that an institution provides quality education. Accrediting bodies typically address the quality of the program and institution, not course design. Distance education components may or may not be included in accreditation assessment. Quality Matters™ (QM) is a research-centered approach to continuous quality improvement for online learning. QM addresses only course design, not the quality of a program or institution. The primary aim of this article is to examine the intersection of exemplar accreditation standards from a representative professional association and Quality Matters™ Rubric Standards (QM Standards) for best practice in distance education. The author evaluated primary standards documents for congruity and disparity, strengths and limitations. Such close examination may serve as a model for accrediting bodies to engage in open dialog to improve the quality of distance education. The author concluded that standards are complementary in this instance; however, the numerous differences indicate opportunities for enhancement. The intent of each accrediting organization and their respective standards is the benefit of stakeholders. The author recommends collaboration between accreditation agencies and institutes of higher education to modify standards related to distance education. Modifications to each set of standards have the potential to improve the quality of distance education for the benefit of institutions of higher education, the public, learners, and their respective professions.

Keywords: accreditation, distance education

Introduction

The process of accreditation is a systematic review through which the public may be assured that an institution provides quality education.

Accrediting bodies typically address the quality of the program and institution, not course design. Quality Matters™ (QM) is a research-centered approach to continuous quality improvement for online learning (<https://www.qualitymatters.org/>). Quality

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Matters™ addresses only course design, not the quality of a program or institution. The primary aim of this article is to examine the intersection of exemplar accreditation standards from a representative professional association and Quality Matters™ Rubric Standards (QM Standards) for best practice in distance education. Such close examination may serve as a model for accrediting bodies to engage in open dialog to improve the quality of distance education. This comparative exercise focuses on exemplar standards of the Accreditation Council for Occupational Therapy Education® (ACOTE) of the American Occupational Therapy Association (AOTA). The ACOTE standards are similar in format and intent to those of other health professions.

Accreditation in Higher Education

In the United States, accreditation is a process of voluntary, external, non-governmental, systematic review of educational institutions and programs for quality assurance and improvement (Eaton, 2009). Accreditation is intended to support improvement of the institution or program. The Council for Higher Education Accreditation (CHEA) is the largest non-governmental higher education organization in the United States, supporting academic quality through voluntary accreditation. The United States Department of Education (USDE) publishes a database of nationally recognized accrediting bodies determined to meet acceptable levels of quality for programs and degrees within institutions of higher education (<http://ope.ed.gov/accreditation/>). USDE does not accredit individual degrees, programs or institutions. CHEA focuses on academic quality in courses, programs, and degrees, while USDE focuses on financial and administrative practices for federal student

aid funding. CHEA reports that more than 8,400 degree and non-degree-granting institutions are recognized as specialized accrediting organizations either through USDE, through CHEA or both (CHEA, 2014). These national, regional, and specialized accrediting bodies develop specific evaluation standards and guidelines used during peer review for determination of compliance. Many of these are health and human service professions such as audiology, nursing, optometry, and pharmacy. Accreditation directly benefits the public, students, institutions of higher education, and the professions overseen via specialized accrediting bodies such as ACOTE.

Accreditation Council for Occupational Therapy Education

ACOTE accredits educational program degree levels for the occupational therapist (OT) and the occupational therapy assistant (OTA). USDE and CHEA each recognize ACOTE as an accrediting organization. ACOTE “establishes comprehensive standards for occupational therapy education at multiple degree levels, thereby supporting the preparation of competent occupational therapists and occupational therapy assistants” (AOTA, 2013 p3). The most current ACOTE Standards and Interpretive Guide, consistent with the requirement of the USDE, became effective July 31, 2013 (AOTA, 2013). The Standards are competency-based, describing the knowledge and skills necessary for occupational therapy practitioners to serve in a variety of roles in response to the “rapidly changing and dynamic nature of contemporary health and human services delivery systems” (ACOTE, 2011 p1). ACOTE does not address course design. ACOTE routinely collects data

from educational programs, including the percentage of distance components. The latest data reporting current distance education components for entry-level OT doctoral degree programs, entry-level OT master's degree programs, and occupational therapy assistant programs are available here: (AOTA, 2014). ACOTE/AOTA categorize the raw data according to the USDE definition of distance education as that which uses "one or more of the following technologies to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include:

1. The Internet;
2. One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
3. Audio conferencing; or
4. Video cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3)" (2014).

In an effort to determine quality associated with distance components, ACOTE publishes a Distance Education Checklist of 20 items addressing related 2006 Accreditation Standards, which program faculty and accreditation evaluators use to determine compliance (AOTA, 2006). Professional development is available to program directors and practitioners interested in serving as accreditation evaluators. No research currently addresses the role of ACOTE Standards in the quality of education.

Distance Education

Multiple and various definitions of distance education describe specific methods of delivery; note students as being separated from the instructor; and enumerate a variety of types of interaction, including the Internet, audio-conference, video-conference, synchronous and asynchronous chat, DVD, CD-ROM, etc. For the purpose of this article, the author adopts the CHEA definition of distance education, "application of electronic technology to teaching and learning" (Eaton, 2001, p. 3). CHEA has historically been instrumental in publishing documents describing the fundamental components for accreditation to address distance education. For example, the CHEA "Fact Sheet #2: The role of accreditation and assuring quality in electronically delivered distance education 2001" describes the role of accreditation in assuring quality, as well as the ways in which national and regional accrediting agencies manage standards and accountability for distance education (CHEA, 2001).

Changes in distance education present new challenges for accrediting bodies (Legon, 2006). Regional and national accrediting agencies are now responsible to examine distance education in their routine review of programs and institutions of higher education. Since 2010, the USDE has required each institution under review to "demonstrate its evaluation of distance education and/or correspondence education in order to retain distance education and/or correspondence education in its scope of recognition" (USDE, 2014). Keil and Brown (2014) reviewed six current regional and national accrediting organizations in the United States, examining policies addressing "institutional context and commitment; curriculum and instruction; faculty and faculty support; student support; and

evaluation and assessment” (p. 1). Quality and best practice in education are repeated concerns across each agency and each policy area.

Quality Matters

Before the QM Standards were developed, several regional accrediting bodies studied distance education, expressing the need to develop a means for relevant measurement to assure quality. The Higher Education Opportunity Act (Act) established requisites for accrediting bodies to assure the quality of programs offered through distance education (Higher Education Opportunity Act of 2008, Pub. L. No. 110–315, 122 Stat. 3494 (2008)). Further, the Act requires that the agency or association’s standards “effectively address the quality of an institution’s distance education” but “shall not be required to have separate standards, procedures, or policies for the evaluation of distance education” (Higher Education Opportunity Act of 2008, Pub. L. No. 110–315, 122 Stat. 3325 (2008)).

In 2003, the MarylandOnline (MOL) Consortium initiated the Quality Matters project. MOL is a voluntary, non-profit group of post-secondary educational institutions in the state of Maryland. The QM project proposed the creation of standards for course design and peer review, assuring the quality of online courses. QM does not address the quality of the program or institution. The USDE supported the project through the Fund for the Improvement of Postsecondary Education (FIPSE). The FIPSE grant supported the first finalized QM Rubric Standards, a process of course review, and an instructor worksheet. Developers created benchmark criteria for course assessment to be points of reference for best practice rather than rigid measures.

The current QM Standards (<https://www.qualitymatters.org/>), now in the fifth edition, are used to evaluate individual (blended or online) courses using 43 criteria categorized into eight general standards, listed below. QM Standards include detailed descriptions for each criterion for interpretation and implementation during course development and review. Each general standard contains an overview statement, relating its place in the process. Each specific Standard contains detailed annotations with explanation, instructions for interpretation, examples, and recommendations for application to blended courses.

1. Course Overview and Introduction
2. Learning Objectives (Competencies)
3. Assessment and Measurement
4. Instructional Materials
5. Course Activities and Learner Interaction
6. Course Technology
7. Learner Support
8. Accessibility and Usability

The QM program reflects a grass-roots heritage in which faculty experts collaborate, modifying the Standards for course design as distance education develops. In addition to course assessment, the broad goals of the QM program include faculty development and continuous improvement through critical analysis for the purpose of increased student engagement, learning, and satisfaction. QM also provides professional development to instructional designers, all levels of faculty, and academic administrators. Shattuck, Zimmerman and Adair (2014) describe the process of regular review of the QM Standards to ensure their applicability within a broad variety of educational levels and disciplines. They discuss the process of continuous improvement in relationship

to Boyer's model of scholarship. QM is now a self-sustaining program and process for which institutions provide a fee-for-service or subscription to participate in professional development, including peer reviewer training to promote best practice in distance education.

Comparison and Analysis

Proliferation of distance education programs presents challenges for national, regional, and specialized degree granting organizations. The author evaluated primary standards documents from ACOTE and QM for congruity and disparity, strengths and limitations. For clarification, national, regional, and specialized accreditation are concerned with programs and institutions as a whole. Accreditation reviewers examine administrative concerns such as sponsorship of the institution, academic and student resources, fiscal management, operational and admission policies, strategic planning, and program evaluation. Reviewers may also examine curricular frameworks and content, particularly for specialized degrees and programs, however, QM reviewers assess and recognize only individual courses, without examination of larger institutional concerns. QM reviewers may see elements of institutional or programmatic, administrative concerns addressed within a single course, but QM is not intended to be a substitute for the larger focus of national, regional or specialized accreditation (Legon, 2006).

The following table is a comparison between the ACOTE Standards on the Distance Education Checklist and the corresponding QM Standards. Many of the ACOTE Standards address institutional accreditation and cannot be assessed against the QM Standards focus at an individual course level. The comparison is

an attempt to determine congruity, gaps, and opportunities. **The QM Standards Rubric may be reprinted only with explicit permission of a QM staff member, which was not provided for this article.** The **QM Higher Education Rubric, Fifth Edition, 2014 Standards only are available for individual, single-use at the QM website:** <https://www.qualitymatters.org/rubric>. The downloadable document is intended solely for transparency to the public; the complete document with its rich explanations and supporting materials is available through paid services. The reader may contact MarylandOnline, Inc. at info@qualitymatters.org for information or reprint permission. ACOTE Standards are available for download at <http://www.aota.org/-/media/Corporate/Files/EducationCareers/Accredit/Standards/2011-Standards-and-Interpretive-Guide-August-2013.pdf>. ACOTE Distance Education Checklist, a portion of the ACOTE Standards, is available for download at <http://www.aota.org/Education-Careers/Accreditation.aspx>. The author, a long time ACOTE accreditation reviewer, updated the existing ACOTE Distance Education Checklist to reflect the corresponding 2011 Standards, effective July 31, 2013. The first column within the table lists the ACOTE Standard. The second column lists recommended ACOTE questions to illuminate each Standard. The third column lists the related QM Standard, noted as *essential* where relevant. The last column contains the author's comments about the relationship between the two sets of standards.

Table 1
Comparison of Distance Education Checklist ACOTE Standards with Quality Matters Standards Rubric

ACOTE Standard	ACOTE Clarifying Question	QM Standard	Commentary
General Admission/ Policies/Publications			
<i>Standard A.3.1. Admission of students to the occupational therapy / therapy assistant program must be made in accordance with the practices of the institution. There must be stated admission criteria that are clearly defined and published and reflective of the demands of the program.</i>	Do the stated admission criteria inform students of technology and other requirements for the distance education components of the program?	<i>Standard 1.5 Pertains to technology requirements.</i>	Close match. Institutional practices and QM technological course requirements.
<i>Standard A.3.3. Policies pertaining to standards for admission, advanced placement, transfer of credit, credit for experiential learning (if applicable), and prerequisite educational or work experience requirements must be readily accessible to prospective students and the public.</i>	Are students informed about required competencies for the distance education component?	<i>Standard 1.6 Pertains to prerequisite knowledge Standard 1.7 Pertains to technical skills</i>	Close match. Institution and course identify prerequisite competencies for the discipline and for the use of course technology.
<i>Standard A.4.1. All program publications and advertising – including, but not limited to, academic calendars, announcements, catalogs, handbooks, and Web sites – must accurately reflect the program offered.</i>	Does advertising about the program clearly and accurately represent the distance/electronic component of the curriculum?	<i>Standard 1.1 (Essential) Pertains to course navigation</i>	Limited match. Institution or program indicates which courses or program elements may include distance learning. QM indicates what to expect for the course, including where components may be found.
	Are students informed about the component of distance learning?		
Faculty Services			
<i>Standard A.2.6. The program director and faculty must possess the academic qualifications and backgrounds (identified in documented descriptions of roles and responsibilities) that are necessary to meet program objectives and the mission of the institution.</i>	Do the faculty in the program offering distance education have experience with a distance/ electronic learning format?	<i>Not addressed</i>	No match. Recognized QM courses may suggest the qualifications of faculty.

<p><i>Standard A.2.11.</i> <i>The faculty must have documented expertise in their area(s) of teaching responsibility and knowledge of the content delivery method (e.g., distance learning).</i></p>	<p>Do faculty using the distance/electronic learning format have the necessary expertise to ensure appropriate content delivery?</p>	<p><i>Not addressed</i></p>	<p>No match. Recognized QM courses may suggest the expertise of faculty.</p>
<p><i>Standard A.5.2.</i> <i>The program director and each faculty member who teaches two or more courses must have a current written professional growth and development plan. Each plan must contain the signature of the faculty member and supervisor. At a minimum, the plan must include, but need not be limited to,</i></p> <ul style="list-style-type: none"> <i>· Goals to enhance the faculty member's ability to fulfill designated responsibilities (e.g., goals related to currency in areas of teaching responsibility, teaching effectiveness, research, scholarly activity).</i> <i>· Specific measurable action steps with expected timelines by which the faculty member will achieve the goals.</i> <i>· Evidence of annual updates of action steps and goals as they are met or as circumstances change.</i> <i>· Identification of the ways in which the faculty member's professional development plan will contribute to attaining the program's strategic goals.</i> 	<p>Are distance/electronic learning objectives included in professional development plans of faculty responsible for this type of content delivery?</p>	<p><i>Not addressed</i></p>	<p>No match. Completed QM professional development may suggest scholarship of faculty.</p>
<p>Budget</p>			
<p><i>Standard A.2.17.</i> <i>The program must be allocated a budget of regular institutional funds, not including grants, gifts, and other restricted sources, sufficient to implement and maintain the objectives of the program and to fulfill the program's obligation to matriculated and entering students.</i></p>	<p>Is the organizational structure of distance education reflected in the overall budget?</p>	<p><i>Not addressed</i></p>	<p>Adoption of the QM rubric or institutional membership may indicate fiscal planning including course quality.</p>
	<p>Are funds available for faculty to learn distance/electronic learning format?</p>	<p><i>Not addressed</i></p>	
	<p>Is adequate support available for faculty preparing courses offered electronically?</p>	<p><i>Not addressed</i></p>	
	<p>Is the budget sufficient for updating technology?</p>	<p><i>Not addressed</i></p>	

Student Services			
<p><i>Standard A.2.18.</i> <i>Classroom and laboratories must be provided that are consistent with the program's educational objectives, teaching methods, number of students, and safety and health standards of the institution, and must allow for efficient operation of the program.</i></p>	<p>Are classrooms, labs, technology, and resources adequate to support a distance learning environment education?</p>	<p><i>Standard 6.1 (Essential)</i> <i>Pertains to course tools</i> <i>Standard 7.1 (Essential)</i> <i>Pertains to course instructions</i></p>	<p>Close match. Institution and QM verify technology and support provided. Indicate whether instructor is directing student to resources. Both related to objectives. QM addresses materials and methods in sections 4 & 5.</p>
<p><i>Standard A.2.19.</i> <i>If the program offers distance education, it must include</i></p> <ul style="list-style-type: none"> · <i>A process through which the program establishes that the student who registers in a distance education course or program is the same student who participates in and completes the program and receives academic credit,</i> · <i>Technology and resources that are adequate to support a distance-learning environment, and</i> · <i>A process to ensure that faculty are adequately trained and skilled to use distance education methodologies.</i> 	<p>Does the program have a process through which it establishes that the student who registers in a distance education course or program is the same student who participates in and completes the program and receives the academic credit?</p>	<p><i>Not addressed</i></p> <p><i>Standard 6.3 (Essential)</i> <i>Pertains to technology</i> <i>Standard 6.4</i> <i>Pertains to technology</i></p>	<p>QM course review could be expanded to address security in testing or assignment submission.</p> <p>Close match. Institution and QM describe relevant technologic tools, readily available, downloadable, cost-effective.</p> <p>Adoption of the QM rubric or institutional membership may indicate commitment to professional development.</p>
<p><i>Standard A.2.26.</i> <i>Students must have ready access to a supply of current and relevant books, journals, periodicals, computers, software, and other reference materials needed for the practice areas and to meet the requirements of the curriculum. This may include, but is not limited to, libraries, online services, interlibrary loan, and resource centers.</i></p>	<p>Are related materials readily available?</p> <p>Are they sufficient for use with distance/electronic learning format?</p> <p>Is the help desk readily available when course most likely accessed?</p> <p>Is training available for students?</p>	<p><i>Standard 7.3</i> <i>Pertains to academic support</i> <i>Standard 7.4</i> <i>Pertains to student services</i></p>	<p>Close match. Institutional and QM direct links to resources and student services; library, financial, health, technology.</p>
<p>Curriculum and instruction</p>			

Curriculum and instruction			
<p><i>Standard A.6.7.</i> The curriculum design must reflect the mission and philosophy of both the occupational therapy program and the institution and must provide the basis for program planning, implementation, and evaluation. The design must identify curricular threads and educational goals and describe the selection of the content, scope, and sequencing of coursework.</p>	<p>Does the distance/ electronic learning format fit within the current curriculum design?</p>	<p><i>Standard 2.2 (Essential)</i> Pertains to learning objectives</p>	<p>Limited match. QM addresses course level only consistency between module and course learning objectives. QM does not address curriculum design or relationship to mission.</p>
<p><i>Doctoral Standard A.6.8.</i> The program must have clearly documented assessment measures by which students are regularly evaluated on their acquisition of knowledge, skills, attitudes, and competencies required for graduation.</p>	<p>Are students evaluated on their acquisition of knowledge, skills, attitudes, and competencies?</p> <p>Are the assignments available through electronic learning appropriate for the development of competencies?</p>	<p><i>Standard 3.1 (Essential)</i> Pertains to assessments <i>Standard 3.5</i> Pertains to self-assessment</p>	<p>Limited match. Institution and QM document consistency of course goals, learning objectives, and assessment with single course. QM does not align course with larger programmatic or degree competencies.</p>
<p><i>Standard A.6.9.</i> The program must have written syllabi for each course that include course objectives and learning activities that, in total, reflect all course content required by the Standards. Instructional methods (e.g., presentations, demonstrations, discussion) and materials used to accomplish course objectives must be documented. Programs must also demonstrate the consistency between course syllabi and the curriculum design.</p>	<p>Are the syllabi clear and easy to understand with no opportunities for alternate interpretation of content?</p> <p>Are the learning objectives and competencies appropriate in rigor and breadth of non-distance courses?</p>	<p><i>Standard 1.2 (Essential)</i> Pertains to course syllabus <i>Standard 2.1 (Essential)</i> Pertains to measurable outcomes <i>Standard 2.4 (Essential)</i> Pertains to course activities <i>Standard 5.1 (Essential)</i> Pertains to course activities <i>Standard 5.2 (Essential)</i> Pertains to active learning</p>	<p>Limited match. Institutional template and QM require clarity in syllabus. QM does not address consistency between course syllabus and curriculum design.</p>
Evaluation and assessment			
<p><i>Standard A.3.6.</i> Evaluation content and methods must be consistent with the curriculum design, objectives, and competencies of the didactic, fieldwork, and experiential components of the program.</p>	<p>Is evaluation/assessment of student performance consistent?</p> <p>Are technologies available for instructor/student interaction (e.g., e-mail, chat rooms, fax, threaded discussions, phone)?</p>	<p><i>Standard 3.2 (Essential)</i> Pertains to grading policy <i>Standard 3.3 (Essential)</i> Pertains to evaluation criteria <i>Standard 3.4</i> Pertains to assessment instruments</p>	<p>Close match. Institution and QM require clarity in means of assessment, grading criteria, and feedback for individual courses. QM does not address curriculum design.</p>

	Does the distance education portion of the program result in outcomes of the same quality as other on-site courses?		
<i>Standard A.3.7.</i> <i>Evaluation must be conducted on a regular basis to provide students and program officials with timely indications of the students' progress and academic standing.</i>	Is there timely instructor response/feedback to student assignments and inquiry?	<i>Standard 3.5</i> <i>Pertains to self-assessment</i> <i>Standard 5.3</i> <i>Pertains to instructor response</i>	Close match. Institutional and QM concern for timely feedback. QM indicators for multiple opportunities to track progress with timely feedback support transparency in student assessment.
<i>Standard A.5.3.</i> <i>Programs must routinely secure and document sufficient qualitative and quantitative information to allow for meaningful analysis about the extent to which the program is meeting its stated goals and objectives. This must include, but need not be limited to</i> <ul style="list-style-type: none"> • <i>Faculty effectiveness in their assigned teaching responsibilities.</i> • <i>Students' progression through the program.</i> • <i>Fieldwork and experiential component performance evaluation.</i> • <i>Student evaluation of fieldwork and the experiential component experience.</i> • <i>Student satisfaction with the program.</i> • <i>Graduates' performance on the NBCOT certification exam.</i> • <i>Graduates' job placement and performance based on employer satisfaction.</i> • <i>Graduates' scholarly activity (e.g., presentations, publications, grants obtained, state and national leadership positions, awards).</i> 	Is there an appropriate means of evaluating faculty effectiveness in delivery of distance education components?	<i>Not addressed</i>	Adoption of the QM rubric or institutional membership may indicate commitment to an examination of faculty effectiveness. QM course review could be expanded to address course and faculty evaluation.

<p><i>Standard A.5.5.</i> <i>The results of ongoing evaluation must be appropriately reflected in the program's strategic plan, curriculum, and other dimensions of the program.</i></p>	<p>Are there examples of how evaluation results have been reflected in curriculum changes, strategic plan, etc.?</p>	<p><i>Not addressed</i></p>	<p>Program evaluation and strategic planning is currently beyond the scope of QM. Adoption of the QM rubric or institutional membership may indicate incorporation of data into program evaluation.</p>
<p><i>Standard A.6.8.</i> <i>The program must have clearly documented assessment measures by which students are regularly evaluated on their acquisition of knowledge, skills, attitudes, and competencies required for graduation.</i></p>	<p>How have the usual methods of measuring communication, comprehension, synthesis, etc. been adapted to assess electronically offered courses?</p> <p>Are technologies available for instructor/student and student/student interaction (e.g., e-mail, chat rooms, fax, threaded discussions, phone)?</p>	<p><i>Standard 3.5</i> <i>Pertains to self-assessment</i> <i>Standard 6.1 (Essential)</i> <i>Pertains to course tools</i> <i>Standard 6.2 (Essential)</i> <i>Pertains to course tools</i></p>	<p>Close match. Institutional and QM concern for regular evaluation. QM supports learning objectives and competencies at the course level, with technologic tools for interaction.</p>

2014 © QM Rubric paraphrased by Nancy E. Krusen

Related Standards from Distance Education Checklist 2006 ACOTE Standards converted to 2011 ACOTE Standards for Doctoral/Master's/OTA

Comparison of ACOTE Standards with QM Standards confirms the unique nature of each process. There are areas of close congruity, areas of limited congruity, and areas of incongruity across standards. There is congruity regarding admission policies, publications, and student services. Both sets of standards examine technology and support provided with instructor directions to student resources. There is congruity for evaluation and assessment. Both sets of standards recommend clarity in tracking student progress, identifying means of assessment, identifying grading criteria, and providing feedback to students within individual courses. There is limited congruity regarding finances, curriculum and instruction. Institutional standards explicitly address the area of budget. The consumer may imply budgetary support of distance education when institutions voluntarily subscribe to Quality Matters.

Institutional and QM standards each examine minimal consistency between course goals, learning objectives, and assessment. There is poor congruity addressing faculty expertise or professional development. Though QM as an organization is devoted to development of faculty expertise, the standards rubric for course evaluation does not determine such qualifications. Institutional membership or individually recognized courses or faculty completion of QM peer review training may indicate faculty expertise. There are no areas of congruity for larger issues of curricular design, programmatic or degree competencies. While QM addresses consistency of course goals, learning objectives, and assessment within the syllabus of a single course, there are no connections to larger issues of curricular design, programmatic or degree competencies. Program evaluation and strategic planning are outside the scope of QM.

Implications/Recommendations

The comparison indicates instances of close, limited, and poor congruity across standards that address institutional practices and those which address individual course requirements. The comparison suggests opportunities for dialog between organizational members to consider modifications for increased congruence between institutional practices and individual course requirements. Keen opportunities exist in the areas of course design to align with curricular framework, and program evaluation for strategic planning. Such close examination may serve as a model for other professional accrediting bodies to engage in open dialog. Limited communication and lack of research across accrediting bodies perpetuates a fragmented system. The comparison of standards in this article suggests possibilities for complimentary cohesion without duplication. Could specialized professional accrediting bodies, such as ACOTE, examine course design as part of accreditation? ACOTE Standards appear to be missing items QM identifies as essential components of good quality distance education, particularly the design of learning objectives, instructional materials, and issues of accessibility and usability. Modifications to ACOTE Standards could include elements of course overview, learner-centered objectives, instructional materials and methods, course activities, and accessibility. Could QM examine the connection between individual courses and larger curricular concerns? QM Standards do not integrate individual courses with overall programmatic concerns, a vital part of professional education. Modifications to QM standards could include the alignment of individual course goals and learning objectives with programmatic mission, vision, and curricular design, demon-

strating consistency across individual courses in support of professional programs and degrees.

Modifying standards within professional accrediting bodies and QM, and across other accrediting organizations has utility for education, practice and research. Careful writing could incorporate the missing concepts into updated standards documents for each respective organization without being prescriptive. Not all faculties who have background in a content area also have expertise in teaching. Faculty development to acquire expertise in distance education may enable improved clarity in course design reflective of institutional requirements, degree competencies, and overall program cohesion. Clear course design with program alignment is part of best practices to improve student engagement, satisfaction, and success (Ralston-Berg, 2014). Future research could include five "components" of teaching: (a) instructional design, (b) instructional delivery, (c) instructional assessment, (d) content expertise, and (e) course management (Arreola, 2000 p24). Researching our teaching, referred to as the Scholarship of Teaching and Learning (SoTL), could address many areas revealed in this study examining the influence of accreditation on learning. This author concurs with Keil and Brown (2014) that accreditation agencies and institutes of higher education could collaborate to modify standards related to distance education. For example, topics and questions may include:

1. How does institutional membership, professional development or adoption of the QM rubric indicate organizational commitment to faculty qualifications as distance educators?
2. Does adoption of the QM rubric or institutional memberships indicate

fiscal management used to implement and maintain the goals of the institution or program.

3. What is the best use of data from QM course reviews for incorporation into strategic planning and outcome evaluation?
4. How does learner engagement in course design elements influence overall programmatic or degree competencies?

Each of these items may close the gap between the two types of standards, with utility for initial or re-accreditation of institutions and programs.

Conclusion

The author concludes that exemplar ACOTE and QM Standards are generally well matched, with an excellent opportunity for mutual benefit. This conclusion reinforces that of Legon (2006). Legon notes consistency in his comparison of QM with accreditation standards for distance learning, also recommending further development of the QM Standards. As previously noted, specialized standards are concerned with general institutional compliance with operational and administrative matters that are outside the scope of QM reviews. QM Standards are specific to individual courses but do not address the linkages across curriculum design, competencies for graduation, or program evaluation, necessary components of professional education. Accrediting bodies for professional programs, such as ACOTE, typically address the quality of the program and institution, needing to add course design to their assessment. Together, the Standards are complementary. The intent of each accrediting organization and their respective standards is the benefit of stakeholders. Key points to the article are:

- Individual course design and structure cannot be examined in isolation from curricula, programs, degrees, or organizations for professional education.
- Individual course design and structure should be integral to programs for professional accreditation.
- Integration across accrediting body standards and quality improvement standards will promote best practice for distance education.

Revisions to each set of Standards have the potential to improve the quality of distance education. Modifications would benefit the public, students, institutions of higher education, and their respective professions. The author recommends additional research and collaboration to examine specific concerns of accreditation for distance education.

Key Points:

- **Individual course design and structure cannot be examined in isolation from curricula, programs, degrees, or organizations for professional education.**
 - **Individual course design and structure should be integral to programs for professional accreditation.**
 - **Integration across accrediting body standards and quality improvement standards will promote best practice for distance education.**
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