



# **QUALITY ASSURANCE AND ALTERNATIVE HIGHER EDUCATION: A POLICY PERSPECTIVE**

**August 2014**

**The Commission on  
Quality Assurance and Alternative Higher Education**

## *EXECUTIVE SUMMARY*

The Council for Higher Education Accreditation and the Presidents' Forum established a Commission on Quality Assurance and Alternative Higher Education in Fall 2013. The purpose was to explore the growth of alternative or the "non-institutional" sector of higher education and whether some form of external quality review that is both voluntary and non-regulatory would be desirable. This sector is composed of providers other than traditional colleges and universities that offer courses, modules or badges. The offerings in this sector are primarily online and non-credit, free or low-cost. It has been enrolling significant numbers of students and may be on its way to serving as a major means of undertaking some postsecondary experience, either augmenting or substituting for a more traditional college experience.

Co-chaired by Stephen Joel Trachtenberg, President Emeritus and University Professor of Public Service at The George Washington University and Ann Rondeau, Vice Admiral, USN (Ret.) past president of the National Defense University and currently Partner, IBM, The Watson Group, commission members included leaders from colleges and universities, associations, accreditation, business and the alternative education sector. Twenty-six people met in December 2013 and February 2014 to explore this important area.

This publication by the commission provides a summary of its discussion and observations. Six questions have been framed for future consideration and action with regard to the alternative education sector and quality:

- Would a quality review process for alternative providers of postsecondary education offer effective documentation of quality and credibility to the public, including students, policy makers, and employers, providing a useful and viable public service?
- Would a preliminary cost-benefit analysis of a model quality review be informative? If so, how might this be done?
- Would development of an experimental model provide a means to demonstrate and test a workable quality review process? What might that model look like?
- Inasmuch as the offerings of many alternative providers are designed to enable the student to master or demonstrate specific knowledge or skills, would a quality focus that measured competence (student outcomes) be a productive approach?
- Would an external quality review process for alternative providers offer a potential pathway for these organizations to qualify to participate in federal student financial aid programs, if such an opportunity were available?
- How would greater cooperation or adoption of some form of third-party verification or certification of standards of practice shared among organizations that review courses or student learning for credit improve wider understanding, acceptance and utilization of the work of these organizations by colleges and universities?

## ***INTRODUCTION***

### ***Charge to the Commission***

In October 2013, the **Council for Higher Education Accreditation** and the **Presidents' Forum** joined to co-sponsor **The Commission on Quality Assurance and Alternative Higher Education**. The stated purposes of establishing this Commission were to:

- *Explore major changes taking place in higher education through the emergence of alternative providers of educational courses and other materials that are not part of traditional quality and campus approval processes and are primarily online, often at the level of a course or less and not for credit.*
- *Address the existing processes for the quality assurance of these educational offerings by examining possible additions, deletions or changes that are needed to current quality review efforts (institutional quality assurance practices, accreditation) and how this may be accomplished.*
- *Explore future action to assure the quality of alternative sources of postsecondary learning, including consideration of the expansion of traditional accreditation, development of new external quality review standards and practices to non-institutional offerings or the development of new organizations to undertake these activities.*

The Commission would accomplish its work by focusing on issues of quality for educational offerings from providers outside traditional colleges and universities. Such “alternative providers” offer education, including open online “courses” such as Massive Open Online Courses (MOOCs), badges or offerings from private companies. Methodologies employed may involve the familiar lecture-discussion format, competency- or mastery-based evaluation or assessment of prior learning gained through interactive online offerings. By employing these varied means, the providers are important potential contributors to the future of all postsecondary education. They may serve as alternative pathways for students to demonstrate college-level learning and earn credit as well as for specific vocational and other similar purposes. These providers offer a verifiable means to demonstrate to the public and employers credible evidence of learning - a process that could help to maintain a competitive workforce and lead to increased effectiveness and efficiency for all of postsecondary education.

Some alternative providers have been around for many years and are well established, including the military, government, corporations and worker training programs. Other alternative providers are more recent, including providers of MOOCs, badges and coursework from private companies entering the marketplace more recently.

Examples of more recent, high-visibility providers are Coursera, Udacity, edX, StraighterLine, Mozilla and Academic Partnerships, as well as Cengage and Ed2Go, Sophia (Capella) and Prospero (Pearson). Some of the most recent providers are aggregators of student learning, including Degreed, Accredible, Mozilla and Parchment. Coursera enrolls millions of students in hundreds of courses. Udacity had 1.6 million users in April 2014. Based on discussion with the Mozilla Foundation, 13 badge-issuing platforms have resulted in 1.1 million badges. StraighterLine has credit transfer guarantees with 71 partners.

### ***Membership of the Commission***

The Commission is co-chaired by **Stephen Joel Trachtenberg**, President Emeritus and University Professor of Public Service of The George Washington University, and **Vice Admiral Ann Rondeau**, USN (Ret.), past president of the National Defense University and currently Partner, IBM, The Watson Group. The following leaders from postsecondary educational institutions, accreditation commissions, related associations, business and government constitute the full membership of the Commission.

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## *A FOCUS ON ALTERNATIVE PROVIDERS OF POSTSECONDARY EDUCATION*

The postsecondary educational community recognizes a public value in assuring a high level of quality of educational offerings, whatever the provider or the source. It is in the context of the growth and impact of more recent alternative providers of postsecondary education that the Commission on Quality Assurance and Alternative Providers of Higher Education was established. The commission was created to explore the potential need for a system of quality review for providers that are non-institutional in character. Such a system would identify and support those alternative providers who voluntarily meet or adopt and adhere to a set of quality standards and practices. This identification would assist high-quality providers to gain wider recognition, enhance credibility and encourage utilization by institutions and organizations. Also, such identification would increase understanding and acceptance by those in the wider public concerned with consumer protection.

The newer, more recent alternative providers of postsecondary education share several characteristics. They operate outside the structure of traditional, degree- or certificate-granting colleges and universities; none are regularly reviewed by a formally recognized third party focused on quality assurance and quality improvement; and they are a mix of for-profit and not-for-profit organizations. Their offerings may be free or low-cost. The more recent alternative providers are primarily on-line and provide offerings or experiences that are not courses in a traditional sense. These providers do not offer academic credit, although their offerings may sometimes be acknowledged for credit by a traditional college or university, especially if the offerings have already been evaluated and recommended by an acknowledged service that assesses either courses or student learning for credit.

As a basis for discussion, this report describes three categories of providers that are part of postsecondary education. **Category A** includes traditional colleges and universities that are authorized to operate and are accredited by accreditors recognized by the U.S. Department of Education or by the Council for Higher Education Accreditation. **Category B** includes providers of assessment of courses or student learning for credit recommendations and other services. **Category C** includes alternative providers of postsecondary education as described above, either long-standing or recently established. While there are some common characteristics across the categories, each has distinctive features as well.



<b>Characteristics of Providers</b>		
<b><u>Category A</u></b>  <b>INSTITUTIONS</b>  <b>Chartered, Authorized and Accredited Universities and Colleges (public, private, for-profit and nonprofit)</b>	<b><u>Category B</u></b>  <b>ASSESSMENT PROVIDERS</b>  <b>Providers of Assessment of Courses or Student Learning for Credit or Other Purposes</b>	<b><u>Category C</u></b>  <b>NON-INSTITUTIONAL PROVIDERS</b>  <b>Alternative Providers of Education Offerings (established and more recent)</b>
Offer education from colleges and universities structured to provide degrees or certificates in a site-based or distance-based environment for full- and part-time students.	Provide assessment of courses or student learning to confirm academically credible study and recommend academic credit awards, subject to acceptance by Category A institutions.	Typically offer primarily not-for-credit short studies from individual companies that can result in certifications for students studying part-time. More recent providers are typically online. Some providers may seek equivalencies from Category B providers and acceptance by Category A providers.
Hold accreditation from third-party accreditors recognized either by the U.S. Department of Education, the Council for Higher Education Accreditation or both.	Typically do not sustain independent third-party oversight for quality. Generally adhere to qualitative examination acceptable to accredited institutions.	Typically do not sustain independent third-party oversight for quality. May be officially acknowledged by trade or national associations.
Charge tuition and fees.	Charge for services.	Charge little or nothing for offerings, with the exception of certifications.
Considered the primary source of quality higher education for centuries.	Provide either assessment of courses that includes peer review and may include organizational capacity or provide assessment of individual student learning.	Develop offerings that are often responsive to workforce or professional occupational skill requirements and may include offerings in general education or the liberal arts.
May provide longitudinal or other evidence of student performance and success.	Sustain legitimacy and widespread acceptance within the higher education community for long-standing providers.	May provide evidence of effectiveness based on the market and student demand.
May be eligible for federal and state funds for student financial aid, programs, research and facilities.	Are not eligible for federal or state funds	Are not eligible for federal or state funds.



**Category A Providers** are chartered, authorized and accredited universities and colleges. These include public, private, not-for-profit and for-profit institutions. They are long-standing, prominent and recognized providers of college-level courses, certificates and degrees. The quality of these institutions and their offerings is verified through peer review and accreditation. The determination of credit earned by a student rests fully within the purview of the faculty of each college or university.

**Category B providers** are external evaluation and assessment services that conduct peer review-based evaluations of courses or of student learning at the college-level, including comparable competencies. They determine equivalency, recommending whether a particular course or program is worthy of conversion into traditional college credits leading to a university credential or determining whether students have specific learning outcomes or competencies. Such organizations as the American Council on Education (ACE), the National College Credit Recommendation Service (NCCRS) that focus on courses and the Council for Adult and Experiential Learning (CAEL) that focuses on student learning or training, are well established. The recommendations of these assessment services are held to a high standard in their peer review and individual course or student evaluation. Some maintain verification systems for student identification, and secure proctoring of examinations. Assessments may include psychometric outcomes data as well.

Category B providers have been instrumental in promoting acceptance of long-established alternative providers' courses for degree credit by many colleges and universities, helping to move these alternative offerings into the mainstream of postsecondary education. Category B credit services may evaluate the offerings of either well-established or recent alternative providers' products or individual students.

**Category C providers** are a means of offering primarily online courses, parts of courses or other education experiences. Category C providers offer services for continuing education, professional development or general education. They seek to take advantage of opportunities in the postsecondary market created by changing demands for skilled workers, as well as rising tuition costs and sometimes perceived low return on investment from traditional institutionally based degree programs. Such providers are a response to calls for expanded affordability and access to postsecondary education.

To date, Category C providers are not formally reviewed or acknowledged by third-party quality review bodies established for this purpose. Some of their offerings have been evaluated and accepted for credit by Category A colleges and universities and Category B assessment services have reviewed and recommended these offerings. Some Category C providers are newer with a more limited track record of performance. In some cases, new alternative providers might develop partnerships with long-standing providers or subcontract with the long-standing providers.

### ***WHAT IS THE STATUS OF EXTERNAL QUALITY REVIEW FOR ALTERNATIVE PROVIDERS OF POSTSECONDARY EDUCATION? WHY IS THIS IMPORTANT?***

The emergence and growth of newer Category C alternative providers introduces many complex and challenging issues for quality review. The providers are private enterprises that operate outside of the academy. They neither grant degrees nor offer credits. At present, there is no established regimen of quality review for this sector that addresses shared expectations, standards or evaluation of either quality or student learning outcomes. These providers are currently not reviewed or certified by any established third-party charged with these tasks.

While external evaluation of alternative providers for quality is not a new idea, the growth of such providers and the public interest in their offerings is generating renewed interest in this effort. Both competition among alternative providers and the response of the market have an impact on quality. The issue here is in what ways some more formal quality review may be helpful as well, as long as it is voluntary and not regulatory in nature. At the same time, there is an emerging federal policy discussion about the desirability of some financial assistance to students for undertaking these offerings. Alternative providers are viewed as part of a constructive response to address the public policy issues of access and affordability.

### ***HOW MIGHT WE GO ABOUT QUALITY REVIEW FOR CATEGORY C PROVIDERS?***

Category C alternative providers are a growing and valuable sector of postsecondary education. A voluntary, independent process of quality review could offer an effective structure and process to evaluate and acknowledge their quality. In today's climate, it is essential that any review of quality focus primarily on student achievement: What are the learning gains of students? To illustrate how this might work, the commission suggests consideration of a number of the questions and areas such as:

1. *Does the provider possess the appropriate authorization, including evidence of incorporation, small business registry or identification of ownership, to initiate and conduct business?*
2. *What is the evidence of learning gains of students and how is this evidence systematically obtained?*
3. *What is the evidence of effective performance of a provider?*
4. *Does the provider make public its contact information?*
5. *Is the provider fiscally able to support the services offered to the students and able to sustain these in the future?*
6. *What is the nature of the provider's relationship and contact with the student who is undertaking study?*
7. *If study methods include online engagement, is the provider's Website publicly and practically accessible?*
8. *Are the creators of a provider's educational offerings fully qualified in the subject content and means of delivery?*
9. *Are the course requirements clear and consistent with normally accepted practice?*
10. *Is student performance and progress monitored? Are student outcomes recorded and secure?*
11. *What is the nature of the acknowledgment when a student successfully completes the course?*
12. *What are the arrangements for student tuition or fees, if any?*
13. *Does the provider have advertising and other promotional materials with accurate claims of what the student should expect?*
14. *Is the provider subject to any independent, third-party quality review?*

Undoubtedly other issues may be identified as well.

### ***FURTHER EXPLORATION AND CONSIDERATION***

The Commission has reviewed and described the importance, growth and potential quality issues related to Category C alternative providers of postsecondary education. Currently there is no voluntary, independent, third-party review process to evaluate their quality. It is suggesting exploration of a voluntary approach through which some of the quality review issues might be addressed.

At least three paths are available to accomplish third-party quality review of these important new providers: (1) a voluntary cooperative effort among defined members of similar existing organizations; (2) a voluntary service offered by an existing external third-party association or (3) a new external third-party body created solely for this purpose. Recognizing that some of the alternative providers are new and entrepreneurial, a responsive and suitable quality



review program might initially be tested through a pilot demonstration project that recognizes the innovative and entrepreneurial strengths of many alternative providers of postsecondary learning.

For example, inasmuch as Category C alternative providers often focus the student on mastery of a specific skill, task or area of knowledge, a demonstration project could offer an opportunity to explore the relative success of the provider in helping its students achieve a measurable competency. Another benefit of this approach would be to recognize the intrinsic quality and effectiveness of alternative providers.

An external, third-party review process for Category C would establish a public acknowledgment that a provider meets established standards, processes and outcome achievements that warrant appropriate regard and respect. Significantly, this acknowledgment would become a mechanism for the public, employers and students to identify and select those providers who voluntarily meet high quality expectations. Such identification would enhance the opportunities for high-quality alternative providers to gain broad acceptance and credibility.

### ***QUESTIONS FOR FURTHER EXPLORATION***

The following codifies a number of the important issues discussed here, framing these issues as questions to encourage further dialogue and analysis beyond the Commission's purview.

- Would a quality review process for Category C alternative providers of postsecondary education offer effective documentation of quality and credibility to the public, including students, policy makers, and employers, providing a useful and viable public service?
- Would a preliminary cost-benefit analysis of a model quality review be informative? If so, how might this be done?
- Would development of an experimental model provide a means to demonstrate and test a workable quality review process? What might that model look like?
- Inasmuch as the offerings of many alternative providers are designed to enable the student to master or demonstrate specific knowledge or skills, would a quality focus that measured competence (student outcomes) be a productive approach?
- Would an external quality review process for alternative providers offer a potential pathway for these organizations to qualify to participate in federal student financial aid programs, if such an opportunity were available?
- How would greater cooperation or adoption of some form of third-party verification or certification of standards of practice shared among the Category B providers (i.e., ACE, NCCRS and CAEL) improve wider understanding, acceptance and utilization of the work of these organizations by colleges and universities?

### ***CONCLUSION***

The technological breakthroughs of the past decade now enable both traditional institutions and alternative postsecondary providers of education offerings to provide unparalleled access to students, offering multiple opportunities for learning. The world is witnessing a rapidly emerging national and international campus without boundaries. New alternative providers are entering the educational marketplace, joining the ranks of traditional, established providers and gaining acceptance. Even as the landscape changes, however, the challenges to assure and enhance quality remain: How do we develop and provide evidence of student achievement, course and program quality, provider integrity, student identity and honesty and organizational viability and sustainability? The Commission calls upon the postsecondary education community to seize this moment as a critical time to consider development, adoption and extension of new approaches that address the need for institutional and organizational quality review.