



VANDERBILT
AdvancED: The Institute for the
Advancement of Higher Education

Position Statement on Digital Education Programs

Office of Academic Program Review, Assessment, and Accreditation
(OAPRAA)

Office of Academic Program Review, Assessment, and
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Quality Assurance, Accreditation, and Compliance

Overall Objective

The Office of Academic Program Review, Assessment, and Accreditation (OAPRAA) serves to support Vanderbilt’s faculty and staff in ensuring continued excellence in educational offerings while navigating the complexities of compliance with federal, state, and institutional regulations and policies while standing up digital education programs. This resource document is intended to highlight key considerations (beginning page 5) related to compliance that warrant attention during both the development and implementation phases of a new digital education program; however, it does not serve as an exhaustive account of all principals of accreditation.

OAPRAA is excited to partner with members of the Vanderbilt community as they seek to develop digital education programs and encourages all interested parties to reach out as soon as possible, no matter where they are in their process of designing/developing a program. The team may be reached at oapraa@vanderbilt.edu.

Historical Context

An initiative to assure the advanced quality of a college’s curriculum, as compared to that of a “college” offering something that resembled more of a high school curriculum, began in the late 1800s and early 1900s as and was elevated to a more prominent position in the higher education landscape when the GI Bill provided federal funds for veterans to pursue postsecondary degrees.¹ Since then the amount of federal financial aid available to students has grown and the practice of accreditation has expanded alongside the rapid growth in the number of postsecondary institutions, the introduction of for-profit institutions, and the array of learning modalities, among other changes in higher education. This effort to ensure the appropriate use of taxpayer dollars and provide the public with a mechanism for quality assurance, is managed by the [Accreditation Group](#)², which recognizes accrediting agencies and holds them accountable for serving the following primary functions:

- Assess the quality of academic programs at institutions of higher education

¹ <https://www.urban.org/sites/default/files/publication/93306/higher-education-accreditation-and-the-federal-government.pdf>

² Managed by the [Office of Postsecondary Education](#) within the United States Department of Education

- Create a culture of continuous improvement of academic quality at colleges and universities and stimulate a general raising of standards among educational institutions
- Involve faculty and staff comprehensively in institutional evaluation and planning
- Establish criteria for professional certification and licensure and for upgrading courses offering such preparation (applies to specialized/programmatic accreditors)³

Since 1895, Vanderbilt's quality assurance has been primarily managed⁴ by the [Southern Association of Colleges and Schools Commission on Colleges](#) (SACSCOC), which "signifies that [Vanderbilt] (1) has a mission appropriate to higher education, (2) has resources, programs, and services sufficient to accomplish and sustain that mission, and (3) maintains clearly specified educational objectives that are consistent with its mission and appropriate to the degrees its offers, and that indicate whether it is successful in achieving its stated objectives."⁵ In order to maintain accredited status through an institutional accreditor such as SACSCOC, Vanderbilt University's Office of Academic Program Review, Assessment, and Accreditation (OAPRAA) regularly provides documentation of compliance on a multitude of core requirements and principles ranging from Board of Trust and administrative functions, such as having qualified leadership and financial resources to support its mission, to quality assurance measures, such as having adequate faculty and student support services.

Accreditation at Vanderbilt University

Vanderbilt's academic catalog, comprised of a broad array of courses, programs, and degrees, speaks to the incredible diversity of educational experiences and disciplines of study befitting a world-class institution. While distance education offering online/hybrid academic programs are quite new to the university's landscape, many of the needed assurances and practices to document compliance are built-in to the various mechanisms Vanderbilt utilizes to not only approve new programs, but also to maintain those in its academic catalog. As such, not all matters of accreditation and compliance will be encountered at the program level, **but it is important for individuals (faculty, staff, and administrators) interested in developing online/hybrid program of study to familiarize themselves with the standards to which Vanderbilt's academic programs are held accountable.** This familiarity will provide context and, in some respects, clarity to Vanderbilt's own policies, as well as to best practices that will ultimately lead to stronger educational programs.

³ https://www2.ed.gov/admins/finaid/accred/accreditation_pg2.html#U.S.

⁴ SACSCOC serves as Vanderbilt's institutional accreditor; however, several colleges/schools and/or programs are also accredited by discipline-specific agencies. For a full listing, visit OAPRAA's [website](#).

⁵ SACSCOC Mission Statement, found on page 3:

<https://sacscoc.org/app/uploads/2019/08/2018PrinciplesOfAccreditation.pdf>

The federal government defines distance education as follows:

- Education that uses one or more of the technologies listed in paragraphs (2)(i) through (iv) of this definition to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.
 - (2) The technologies that may be used to offer distance education include –
 - (i) The internet;
 - (ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
 - (iii) Audio conference; or
 - (iv) Other media used in a course in conjunction with any of the technologies listed in paragraphs (2)(i) through (iii) of this definition.⁶

For the purposes of this playbook, the OAPRAA team offers the following highlights and *key considerations* to aide faculty, staff, and administrators in developing and proposing online/hybrid programs.

Highlights & Key Considerations

- Overview
 - This is not a full account of each principle of accreditation to which Vanderbilt’s educational programs are held—the OAPRAA team can assist individuals in navigating all these complexities
 - OAPRAA manages the [Proposals to Create or Change Academic Programs \(PCCAP\)](#) process, through which **all** new educational programs are considered. This process necessarily integrates the considerations that must be made to ensure compliance with the standards for accreditation and compliance.
- Key considerations
 - **Mission:** the mission/vision/purpose of educational programs must be aligned with Vanderbilt’s mission in a manner than supports and advances the institution’s educational enterprise

⁶ <https://www.law.cornell.edu/cfr/text/34/600.2>

- **Program:** A program is defined as any coherent course of study that is based on credits and leads to a distinct university credential; thus concentrations, emphases, and tracks *within* a major are considered distinct programs, and certificates are also considered distinct programs, even if earned as part of degree.
 - the requirements for degree completion are appropriate for both the program/discipline of study and Vanderbilt’s academic portfolio
 - For example, SACSCOC’s standard for a master’s-level program is no fewer than 30 credit hours earned
 - the program is marketed appropriately and accurately, including information regarding job placement data, tuition, fees, and financial aid, admissions and degree completion requirements, and presentation of satisfaction of requirements for Professional Licensure
 - regulations managed by the National Council of State Authorization and Reciprocity Arrangements (NC-SARA) dictate the types of acceptable marketing materials and methods of distribution (print, electronic, and other advertisements are acceptable; however, Vanderbilt’s physical presence in another state to engage in marketing requires approval through NC-SARA)⁷
- **Curriculum and Course Content:**
 - qualified faculty are positioned such that they control the curriculum and ensure both appropriate rigor and quality
 - appropriate technology is utilized to deliver educational content
 - The Institute for the Advancement of Higher Education (AdvancED) offers support in this area, as well as maintains a resource document with additional enterprises specializing in the digital delivery of educational content
 - federal regulations provide guidance regarding the awarding of academic credit⁸ — *be sure* that the assignment of credit hours to each course in a proposed program adheres to the school’s definition of credit hours as printed in the catalog⁹
 - at Vanderbilt, the amount of credit earned by successfully completing a course is specifically defined and aligns with the institution’s practice across all programs, or justification for departure from this standard is provided

⁷ https://nc-sara.org/sites/default/files/files/2021-05/SARA_Policy_Manual_21.1.pdf

⁸ <https://www.law.cornell.edu/cfr/text/34/600.2> | <https://sacscoc.org/app/uploads/2019/08/Credit-Hours.pdf>

⁹ <https://registrar.vanderbilt.edu/catalogs/index.php>

- any consortial agreements/arrangements are closely monitored for program content, rigor, and quality befitting of Vanderbilt credit
 - additional support from OAPRAA and other key groups at Vanderbilt will be required for a program featuring a consortial agreement
- **Faculty:**
 - the program is sponsored by enough qualified faculty who are not only subject matter experts but also trained in delivering educational content via online technologies
 - faculty maintain appropriate methods of communication and *substantive interactions* with students, which are also “scheduled and predictable”
 - federal guidelines define such interactions as “engaging students in teaching, learning, and assessment...”¹⁰ in at least two of the following ways:
 - direct instruction
 - evaluating students’ coursework
 - answering questions regarding course content
 - leading group discussions on course content
 - other course-relevant interactions
 - while there is no specific designation of time to constitute *substantive interactions*, it is OAPRAA’s recommendation that faculty follow the requirements for determining credit hours, which defines each credit hours as featuring a minimum of one hour of instructional/class time per week
- **Educational Effectiveness:** ongoing assessment is maintained in a manner that examines the achievement of stated goals and outcomes, and is subsequently utilized to drive improvements and change
 - OAPRAA manages an annual reporting process for all of Vanderbilt’s educational programs. Online/hybrid programs must participate in this process, and will work to demonstrate appropriate student learning outcomes, assessment methods, and analysis of results. This analysis is then to be used to drive annual change and improvements, and evidence of such process must be included in the annual report
- **Resources:**
 - enrolled students are supported by adequate, appropriate, and managed access to library resources, to include journals, publications, and learning resources

¹⁰ <https://www.law.cornell.edu/cfr/text/34/600.2>

- students are granted access to university resources to support complaints, address needs for counseling, and ensure accessibility and usability of technology
- **Students:**
 - students' should be made aware of the expectation of their engagement with the program, which, per federal guidelines, should constitute participating in a minimum of one hour of instructional time per week and two hours of out-of-class work per week for each credit hour earned
 - students are offered appropriate and regularly scheduled orientations to ensure awareness of all resources, support, and institutional policies and practices
 - in partnership with the university's admissions office, or designee, the program must ensure appropriate identification of enrolled students
 - this will include the utilization of secure log-ins, proctored examinations, and other means of identity verification to ensure active engagement and participation in all aspects of the degree program
 - FERPA regulations must be considered in light of the online delivery of educational content, particularly when recording course sessions
 - enrolling international students requires very particular criteria to be met, particularly around visa status and the full-time enrollment requirement—please consult OAPRAA, ODE, and/or a VU admissions team for more information

Provided the incredibly complex nature of the principles of accreditation, which account for regulations set by the federal government, state governments, and other regulatory agencies, the Office of Academic Program Review, Assessment, and Accreditation is excited to partner with AdvancED to offer support in navigating the complexities of accreditation and compliance for educational programs. The OAPRAA team maintains expertise in the areas of assessment, accreditation, and compliance, and strongly encourages individuals interested in learning more about the robust nature of Vanderbilt's accreditation to reach out and schedule an accreditation “crash course” meeting (office hours and meeting availability is also posted to the OAPRAA [website](#)). _____