VIRTUAL SEAT TIME: TRANSLATING ASYNCHRONOUS ONLINE EDUCATION "CLASS TIME" INTO CREDIT HOURS

by

FREDERICK CARL PRASUHN

(Under the Direction of Ronald M. Cervero)

ABSTRACT

For over a century, the American higher education system has used a metric to track learning. This metric became known as the credit hour (CH). The foundation of the CH was time in a classroom. Within the last few decades, asynchronous online education (ASO) has developed. However, a new metric did not develop in order to track learning with no designated classroom time. Thus, translation of CH values for ASO became a concern. The purpose of this study was to determine how "class time" in an asynchronous online higher education learning environment was translated into CHs. Specifically, I examined: (a) What methods do national and regional policies set forth for determining the translation of asynchronous online class time into CHs? (b) What methods do public higher education system policies set forth for determining the translation of asynchronous online class time into CHs? Policy analysis and interviews provided data for this study. Findings indicated that in literature the issue of CH use generally and with ASO is considered a problem. However, there was no literature the addressed how to assign CHs to ASO, nor were there discussions on related policies. Additional findings indicated that CH definitions and practices varied leaving an interpreted value for a CH. Data did not

provide regulations guiding CH assignment to ASO. In October 2010, federal regulations were ratified making a CH worth an equivalent amount of learning that occurred within one hour of instruction plus two student work hours. The new standard was designed to equalize all learning modalities to the same value. The unresolved issue, then, was determining how much learning happened within three hours. Three major conclusions emerged from the study: (a) The federal government, accrediting agencies, and public higher education systems assign credit to asynchronous online education by the same metric as face-to-face classroom learning time; (b) Local institutions' administration and faculty have the responsibility for assigning CHs to asynchronous online education; (c) There are some efforts toward considering a non-time based metric for assigning CHs to asynchronous online education.

INDEX WORDS: academic credit, adult education, asynchronous online education, course credit, credit hour, credits, higher education, Program Integrity Issue, online education

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by

FREDERICK CARL PRASUHN

BA, Asbury College, 1985

MA, Asbury Theological Seminary, 1990

MEd, American InterContinental University, 2004

A Dissertation Submitted to the Graduate Faculty of The University of Georgia in Partial Fulfillment of the Requirements for the Degree

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FREDERICK CARL PRASUHN

Major Professor:	Ronald M. Cervero
Committee:	Janette R. Hill
	Juanita Johnson-Bailey
	Lorilee R. Sandmann

Electronic Version Approved:

Maureen Grasso
Dean of the Graduate School
The University of Georgia
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DEDICATION

This work is dedicated to several persons for loving and supporting me as I made my educational journey. My parents, Fred and Iris, supported me as I made every step of my educational endeavors. Dave sacrificed much to be there for me during this process and for letting me invade our dining room to make my office. Lastly, in memory of Boss and Toots, who instilled in me as a child determination and commitment to do the best I could.

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CHAPTER 1

INTRODUCTION

American higher education for adults has a history of using distance education to provide learning opportunities. Early in the history of distance education educators offered remote learning through correspondence courses and off campus lectures, such as Chautauqua and cooperative extension. Other educational movements included the Lyceum movement, 1826; Chautauqua College of Liberal Arts from 1883-1891; in 1873, the Society to Encourage Studies at Home; and Correspondence University in 1883 (Larreamendy-Joerns & Leinhardt, 2006; Meyer, 1975; Shaw, 1993; B. L. Watkins, 1991). During the end of the twentieth century distance education took advantage of the technology innovations occurring at the time. With the introduction of the Internet, a new format for distance education—asynchronous, synchronous, and hybrid online education—took form and began providing learning opportunities removed from the physical setting of higher education campuses through computers and the World Wide Web.

With education being conducted over the Internet, class time was no longer defined traditionally; i.e., instructor and student in the same location for a designated amount of time. Instead, learners gained alternatives and freedom for when and where they learned and studied. Because of its differences, online education has been watched and evaluated constantly against traditional learning formats and standards.

More recently, though, how credit hour value was allotted to online education, and education in general, has been questioned. Scott (2009b), Office Inspector General of the United States Department of Education (DOE), issued a report on the Middle States Commission on Higher Education stating,

> We found that Middle States [Commission] does not have minimum requirements specific to program length and does not have minimum requirements for the assignment of credit hours. The lack of requirements could result in inflated credit hours, the improper designation of full-time student status, and the over-awarding of Title IV funds.
>
> Middle States senior staff stated that their main focus was on student learning outcomes; however, we did not find that Middle States provided any guidance to institutions and peer reviewers on minimum outcome measures to ensure that courses and programs are sufficient in content and rigor. (p. 2)

The Middle States Commission was not the only accrediting agency under review. Scott (2009c) issued another report stating similar findings to the Commission on Colleges of the Southern Association of Colleges and Schools (SACS). This review found that SACS had "a clearly defined minimum standard for program length in terms of credit hours, it has not defined what constitutes a credit hour" (p. 3). Scott continued by stating that "without defining a minimum standard for credit hours, SACS cannot ensure that its standard is being consistently applied" (p. 3). An Alert Memorandum (Scott, 2009a), specifically addressed how the Higher Learning Commission of the North Central Association of Colleges and Schools granted initial accreditation to a for-profit institution. Scott indicated that Higher Learning Commission had not operated in the best

interest of students and in doing so could not guarantee the quality of education for the private for-profit institution.

As discussed in Chapter 4, other concerns about credit hour use existed. For example, the *Memorandum: Final Audit Report* (Lew, 2003), a report on the managerial oversight of Office of Postsecondary Education within the U.S. Department of Education was issued. The report indicated that the office did not have proper controls in place for evaluating accrediting agencies. As a result, there were many discrepancies found within the office's documents and with compliance by agencies guaranteeing proper program length and academic standards. Differences also existed in how institutions determined credit hour values. Another program, the *12-Hour Rule*, raised alarm by equating learning time to a week's "equivalent" instead of hours and days (Office of Postsecondary Education, 2001). In an attempt to try alternative approaches for online education, the DOE implemented the *Demonstration Program*, July 1999, testing changes in statutes with trial institutions. Findings were positive for online education. Reports reiterated several times that current definitions and statutes were not capable of addressing newer forms of learning. Higher education organizations wanted an alternative since online education allowed more opportunities for adult learners (Paige, Stroup, & Andrade, 2003; Riley, Fritschler, & McLaughlin, 2001; Spellings & Stroup, 2005). The DOE recognized a need to protect learners and governmental funding from unsuitable arrangements within higher education. More recently the DOE issued *Program Integrity Issues* (2010c) to specifically address inappropriate actions found within higher education accrediting agencies and institutions. With the ruling, a credit hour definition was placed into Federal rule. The DOE presented the new definition in order to allow flexibility in educational

offerings and ensure quality and integrity. The design of the ruling permits the use of any learning modality as long as learning is equated to that of three hours and assessed by measurable outcomes.

How accreditation agencies and higher education systems assigned credit hours to online education courses was under intense scrutiny by the United States Department of Education. The examination of credit hour assignment served as a basis for this study. More specifically, the assignment of credit hour values to asynchronous online education courses was what this research addressed.

Adult Learning Needs

Educational requirements changed as our society changed, according to Poley (2008), resulting in employers requiring more college education. The workplace created the need for continual improvement of skills and new knowledge. Hrastinski (2008) stressed this point and emphasized that lifelong learning was critical for adult educational needs. The Web-Based Education Commission (2000) indicated that continual learning was required for all persons in society to meet the growing demands of a global economy and society. The new workforce would be required to be highly skilled and intelligent. The Web-Based Education Commission further stated that online education was a learning format that could meet growing educational needs. Meeting the demand for learning and particularly meeting the needs of busy adults as they work and live were elements higher education institutions would need to address. Acquiring higher education shifted from traditional classroom to providing education any time, any place, and on demand so learners' needs were met in a format suitable for their lives.

Overall Enrollments

Based on 2000 Census data, overall college students age 25 and older showed the greatest enrollment gains. Projections expressed total enrollments for 18-24 year olds would increase by 10%, 25-34 year olds 27%, and 35+ year olds 8% (Hussar & Bailey, 2008). Hussar and Bailey (2008) and Poley (2008) showed that overall college attendance in the United States grew steadily and rapidly over the last 40 years. Current overall enrollments indicated that 73% of students were nontraditional learners (age 25 and older). Another indication of adult learners enrollment growth was the increase of professional degrees—signifying completion of academic requirements for a bachelor degree and the specific training or professional degree of two or more years required beyond the bachelor level (Allen & Seaman, 2007b; Howell, Williams, & Lindsay, 2003).

Online Enrollments

Online education experienced change as well. The Web-Based Education Commission (2000) projected adult nontraditional enrollments in online education would increase steadily in number. Annetta and Shymansky (2006), in a more recent report, indicated that figures from the United States General Accounting Office projected that within the next few years, distance education enrollment of adults "over the age of 35 will outnumber students who are 18 to 20 years old" (p. 1020). The report also indicated that the influence of online learning was providing an alternative for adult learners and would continue to effect growth in adult online learners. Allen and Seaman (2010) discussed how 2008 online education enrollment increased 17% over 2007 online enrollments. Kim and Bonk (2008) and SchWeber (2008) noted that online enrollment

overall continued to increase rapidly. Abel (2005) and Poley (2008) also discussed how a continued rise in online education enrollment was forcing institutions to review policies and practices to provide more online course offerings. These increases, according to Poley (2008), along with a strong rise of racial/ethnic minorities, were expected to continue changing demographics of American higher education. Poley also stated that it was online education that may best meet the new demand for higher education.

Snyder, Dillow, and Hoffman (2008) discussed how technologies and online education is better equipped to meet adult learning needs. Their argument was based on the rise of college learners' computer and Internet use, which rose from 63% in 1997 to 85% in 2003. Many reports indicated that enrollment for online education met the needs of busy working adults by addressing time and place barriers. Also, online learning was more applicable to "just-in-time" learning (Lim, Morris, & Kupritz, 2006). Abel (2005) and Martyn (2003) offered discussion on how just-in-time learning met career needs of adults by allowing flexibility in scheduling and obtaining quality education to achieve knowledge and skills needed for work and life.

Online Higher Education

Online education is different from face-to-face education. Online education mixes together distance education, human-computer interaction, and instructional-technologies removing barriers of space and time there by allowing student and instructor to interact asynchronously as they are physically separated with no set "class time" (Distance Learning Task Force, 1999; Hrastinski, 2008; Larreamendy-Joerns & Leinhardt, 2006; Parsad, Lewis, & Tice, 2008). For purposes of this research, Parsad, et al.'s (2008) definition of online education was used: "formal education process in which the student

and instructor are not in the same place, thus, instruction may be synchronous or asynchronous, and it may involve communication through the use of video, audio, or computer technologies" (p. 1).

Shale (2002) discussed how online education allowed learners flexibility to schedule when and where they studied by using Internet connectivity. Moving learning beyond the confines of college and university classrooms and lecture halls better equipped learning to correspond more with learner need. Online education met adults' educational needs when traditional education classroom structures did not. Adults using distance education removed the element of face-to-face instruction and placed more responsibility on learners. Due to meeting times and location traditional education limited adult learners (Lim, et al., 2006; Lim, Morris, & Kupritz, 2007; Shale, 2002). Thus, asynchronous, synchronous, and hybrid online education provided an alternative modality of learning.

Society, technology, and global influences affect education. Jones, Voorhees, and Paulson (2000) discussed how today's higher education learners looked for educational access to meet their needs, and that learning any time and any place was a component of current educational needs. The challenge for educators and institutions then, according to Bishop and White (2007), and the Web-Based Education Commission (2000), was to work outside the boundaries of traditional education by providing educational opportunities to meet today's and tomorrow's adult learners.

Online educational format statistics continually showed increases in web-based education offered by higher education institutions and in students enrolled in web-based course work. Parsad, et al. (2008) reported in a study for the National Center for

Education Statistics, that during the 2006-2007 academic year 29% of 4,200 institutions surveyed offered degree programs online and that 17% of institutions offered certificate programs online. Further, of 2-year and 4-year Title IV degree-granting postsecondary institutions reporting 66% provided some type of web-based learning. The Distance Education Training Council (2007) reported that most institutional leaders stated the outlook for online education was strong and would continue to grow. The same leaders indicated that online education would eventually become mainstream education as long as quality, excellence, and assurances were present making courses credible and academically sound.

Virtual Seat Time

Beginning in the late 1800s and progressing through to today, the credit hour has served as the educational measurement indicating course completion and time spent in class for instruction. More specifically, the credit hour was implemented for quality control and transferability of learning between K-12 and higher education. The design was to measure the amount of class time students participated in classroom instruction. The credit hour equated to five 40-55 minute classes with an instructor per week lasting throughout the year (Shaw, 1993), or a total of 130 classroom hours for the year (Maeroff, 1994).

Maeroff (1994), Meyer (1975), and Web-Based Education Commission (2000) indicated today's educational system is held accountable by credit hour measurements. When designed, the credit hour was based on traditional classroom instruction. The issue became that educational practices and policies in place today were designed to support the institution instead of the learner. Time, or seat time, became the measurement of

learning. Credit hours measured the time a learner was with an instructor in a classroom setting. With such definition, education that did not fall into the credit hour measurement of time in class was not accounted for in a measureable fashion. For distance education, especially online learning, the concern was how to award credit for activities that were not within the traditional classroom format. Simply, online education was not built on classroom time and cannot be measured in terms of seat time.

Adams and Morgan (2007), and DiMartino and Castaneda (2007) discussed how today's traditional classroom, which tracks and accrues learners' time, permeated all of the educational system and its regulations and policies. Even though educational standards and formats changed, the credit hour system did not. Therefore, the need warranted a move from seat time to another measurement system. The course work of today, especially for online education, no longer fits into the credit hour measurement (Eaton, 2002). Education was no longer bound to classrooms; such as asynchronous online education with no measurable seat time. Meyer (1975) indicated that the credit hour no longer adequately measured learning since education was no longer confined to classroom or lecture time.

Statement of the Problem

The traditional format often used to teach in higher education institutions is classroom instruction in which the instructor is face-to-face with students presenting knowledge to learners during a designated time and in a designated place. Beginning in the late 1800s a time measurement unit was created and implemented to quantify classroom learning addressing the need for educational standards in preparing students for possible college work; i.e., minimal course work and time spent in designated courses

as required for college entrance. Thus, the "Carnegie Unit," known as the credit hour, was created to standardize the amount of education a person needed for entrance into higher education. At that time in history the credit hour provided needed definitions and structures for the growing educational system in the United States. A credit hour became defined traditionally as the classroom instructional time given by an instructor to a student for one hour (considered approximately 50 minutes) per week over the length of a semester (15 weeks). Acceptance of the credit hour occurred slowly as schools implemented the credit hour policy. Student class seat time became the standard measure of course work.

After the initial adoption of the credit hour, another educational phenomenon started when the United States began seeing educational formats different from traditional face-to-face instruction. These new systems provided non-campus educational opportunities separated from classroom and professor by distance, and provided another possible avenue for nontraditional adult learners to gain higher education. Today, a common form of distance education is asynchronous online education in which instructor and student are separated by time and space. Online education is significantly different from face-to-face classes in that online courses do not include designated instruction and class time. The absence of seat time does not allow for a time-based metric to account for the number of credit hours awarded to an online course. The awarding of credit hours is based on contact hours. With online education, there are no definable contact hours, yet credit hours are assigned to such course work either through institutional policies or practices. No research was found that addressed policies and practices by which credit was determined for online education in the absence of contact hours.

Purpose of the Study

The purpose of this study was to determine how "class time" in an asynchronous online higher education learning environment was translated into credit hours. Specifically, I examined:

1. What methods do national and regional policies set forth for determining the translation of asynchronous online class time into credit hours?
2. What methods do public higher education system policies set forth for determining the translation of asynchronous online class time into credit hours?

Three types of organizations were studied (see Chapter 3 for more details). The national organization under review was the U.S. Department of Education. Other examination included the six regional accrediting bodies held as primary sources of endorsement for higher education institutions and their programs. The top ten public higher education systems were used as the third set of organizations examined. Data used for ranking the public system enrollment was determined by enrollment counts provided through U.S. Department of Education.

Significance of the Study

As more adult nontraditional learners enter into higher education, they are looking for alternatives to face-to-face learning so they may better balance work, life, and education. As such, online education enrollment continues to rise changing the demographics of higher education. The increase of online education is challenging face-to-face structures and usage of the credit hour. Specifically, due to the lack of seat time asynchronous online education is not compatible with the definition of and the current

use of the credit hour. Through the examination of credit hour policies relating to asynchronous online higher education, this research project provided needed information for higher education administration to consider alternatives to the credit hour. Therefore, adult education and online education policies and practices may be influenced so that a different metric may be considered or developed when meeting adult online educational needs. Removing the focus from a time-based metric may permit adult learners more accessibility to educational opportunities. Foundational changes in adult online education may provide practical benefits for administration, educators, and learners. Such changes may provide new understandings of adult education and online education theory and praxis, in order to better meet educational opportunities for adult learners with their specific learning needs. Lastly, changes from current credit hour policies and practices may influence the transference or portability of learning from one institution to another.

Benefits for Online Education

As discussed, asynchronous online education does not measure seat time. Instead, the flexibility of online education provides adult learners the opportunity to learn at various times and in multiple locations. Through this study, the policies of awarding credit hours to learning that is not based on seat time were reviewed. Gathering information from multiple sources on credit hour use and examining uses of the credit hour may allow readers the opportunity to consider current use and practice as related to adult online education. Also, this study demonstrates that credit hour use is a matter that should be carefully examined; this is especially so for nontraditional learning settings found in online education. This study provides readers the foundation for evaluative review of credit hour use.

Benefits for Adult Education

Reviewing credit hour use may allow adult learners and educators to better understand the inefficiency of the credit hour system. In doing so, the institution may be able to devise a system in better alignment with adult learning needs. Learners may be given more control of their education by permitting more portability of learning. Further, any changes may permit adult learners more mobility, empowering learners the ability to learn at various settings, and offering learners the opportunity to learn at many institutions without experiencing awarded credit hour value differences and credit hour transfer difficulties. As adult learners in a global society and workforce, continual learning is needed to stay competitive and current. Changing how academic recognition is accomplished may better suit lifelong learning. Doing so would permit acceptance of learning regardless of source, thus giving academic recognition, or "credit," for any, if not all, education.

CHAPTER 2

REVIEW OF LITERATURE

The purpose of this study was to determine how credit hour assignment for asynchronous online education "class time" occurred. The guiding questions for this study were:

1. What methods do national and regional policies set forth for determining the translation of asynchronous online class time into credit hours?
2. What methods do public higher education system policies set forth for determining the translation of asynchronous online class time into credit hours?

This chapter reports an examination of literature pertinent to these questions and this study. Readings gathered were from searches of library databases and resources. After describing literature searches, the information found was organized into primary sections within this chapter: brief history of distance education, defining online higher education, adult learning, virtual seat time, program integrity.

Database Searches

This document reports the findings from a literature review related to this research project. The review incorporated searches to find and examine literature about awarding credit hours as it pertained to online higher education and adult learners using asynchronous online higher education. Online databases were searched as well as online and print journals related to distance education and higher education.

The beginning ERIC database search began with terms “adult learner,” “credit hour,” and “online learning.” Listed in the ERIC thesaurus were other words to include in the search syntax. The synonyms were used to complete complex queries. Doing so filtered the many results to responses specific to online higher education and adult education. All ERIC search syntax limited results to conditions matching: peer reviewed; publication dates 2000-present; and publication types of information analysis, journal articles, numerical/quantitative data, and research reports. The search limitation of publication dates beginning with 2000 resulted in limited hits. It quickly became evident that to fully understand online higher education that the removal of the initial date range was necessary. The adjusted search provided more information pertinent to online education and distance education as a whole. Other databases used did not always permit complex searches. Syntax was adapted for the specific database format.

Once a bibliography was established, a review of several of the documents occurred. A complete review of all sources would have required extensive time and resources due to the number of possible resources. To be more efficient in reviewing materials and to focus more on the set research topic, the decision was made to review each title and abstract to evaluate resources for further reading. The reference screening determined if materials provided a potential resource for the project goal: understanding credit hour use with online adult higher education.

Brief History of Distance Higher Education

Throughout most of its history, leaders in the United States placed value on education. For example, one of the United States earliest established higher education institutions, Harvard College, founded in 1636, began with the purpose of training

Congregational Church ministers. The function of higher education was not just promoting faith. It was also to raise well-rounded persons of society who would serve as influential persons or as leaders in communities (Meyer, 1975; Shaw, 1993). What became the public school systems of today were begun in order to teach young people to read the Bible and to prepare boys for college. In 1647, the Massachusetts Bay Colony mandated schooling provided by townships or parents for boys. It was not until the 1830s that standards were developed and put into place. Horace Mann, Massachusetts Secretary of Education, accomplished this. Setting standards became prevalent for higher education with Harvard establishing admission standards in 1642 and for general public education during the 1830s (Shaw, 1993).

Throughout the development of an educational system in the United States, many saw the purpose of education as bettering society through learning and believed that anyone wishing to gain from education should be afforded the opportunity. Larreamendy-Joerns and Leinhardt (2006) and Watkins (1991) discussed historical adult educational movements. These efforts included the Lyceum movement started by (a) John Holbrook, Connecticut, 1826; (b) Chautauqua begun by John H. Vincent, 1873, in Western New York; (c) Chautauqua College of Liberal Arts from 1883-1891, a joint effort with Yale University and the State of New York; (d) the Society to Encourage Studies at Home, founded by Anna Ticknor in 1873, to provide learning opportunities for women through correspondence home study; and (e) Correspondence University in 1883, which also took education beyond the academy into persons homes. However, taking education to the people beyond the academic institution brought a tension that caused division. Many believed that education was for the people, and that universities and colleges had the

responsibility to provide sufficient learning opportunities for anyone who wanted to gain knowledge. However, American higher education, like European institutions, became available for those with the financial backing capable of paying for tuition, books, and residential attendance. Additionally, colleges did not always accept students from the public schools as based on academic merit. Higher education became an elitist practice. With the industrial age came the public demand for further education to meet the need for trained, knowledgeable, and skilled workers. Quickly, a split over the purpose of education surfaced: learning as a way to gain knowledge and experience equipping persons to work and function within society, or academics to bring recognition and award for those demonstrating competencies and accomplishments that show gain in knowledge and application of that knowledge through logic and reason (Larreamendy-Joerns & Leinhardt, 2006; Meyer, 1975; Pittman, 1991; Watkins, 1991).

Because of visionary leadership, political maneuvering, and public demands, the academy relinquished some power to the people through lectures and correspondence course work. These formats became a popular source of education for many. However, academics judged such learning as inferior and insufficient. Higher education scholars continually stated that education outside of the classroom was not valid learning and that dissemination of knowledge to persons was best accomplished for those attending universities that provide resident teaching, graduate education, and research (Larreamendy-Joerns & Leinhardt, 2006; Meyer, 1975; Pittman, 1991; Watkins, 1991). Although this dichotomy existed, there were advances in education that promoted distance education and the need it met.

Distance Education by Correspondence and Extension

U.S. distance education may find its roots beginning in correspondence course work provided by Illinois Wesleyan University. Non-residential students took courses "in absentia." The program was designed to offer bachelor, master, and doctoral degrees to those who were unable to attend classes on campus due to work and/or financial limitations (Watkins & Wright, 1991). A change from an agrarian society to an industrial society occurred as advances in mechanics, technology, and knowledge took place from the late 1800s into early 1900s. A societal need developed associated with this change. Adults required more knowledge to perform work-related duties, and greater expectation of knowledgeable citizens. Learners used distance education to address this need. From the end of the 19th century and well into the 20th century, educational changes occurred out of societal demands, and out of the need to provide standards and controls for quality learning. It was during this era that correspondence course work found a small place within academia (Dudgeon, 1975; Phillips, 1973; Williams & Andrews, 1973).

Two major events ushered in more prominence for America's distance education. The first was when John D. Rockefeller recruited William Raney Harper to organize the University of Chicago in 1890. Harper believed the university could take the provided funding and support for learning beyond the academy. Harper dedicated the university to the discovery and dissemination of knowledge. The directives for all levels of the university were to provide sound instruction with valid methods yet flexible in meeting learning needs. Although Harper maintained safeguards for quality education through correspondence, much of the academic community did not see such work as true academic education. Even though correspondence was seen as a way to address

individuals' and groups' academic learning needs beyond the confines of the institution, funding and support eventually waned, placing this form of distance education to the fringes of the academic institution (Gaytan, 2008; Larreamendy-Joerns & Leinhardt, 2006; Pittman, 1991; Watkins, 1991; Wright, 1991). Due to societal demands, other universities reluctantly began offering correspondence course work. These efforts, however, struggled to make correspondence learning an accepted form of education.

The Morrill Act of 1862 formed land-grant universities. This forced educational change so that the focus of education shifted from liberal arts institutions to practical application of knowledge; especially so in the fields of agriculture and mechanics. One of the first programs was at the University of Wisconsin. With the new directive to move education from liberal arts practice to applicable knowledge and skills another form of distance education influenced America. Extension programs developed in order to provide teachers and workers an opportunity to gain knowledge and skill. These programs moved education from the academy to people within society. Many universities did not pursue extension programs. Due to societal pressures, however, universities slowly began providing alternative educational opportunities for people. Another program that focused on the learning needs of people was Thomas J. Foster's correspondence courses for miners in mechanical drawing, mechanical engineering, and electrical engineering. During the late 1800s and into the early 1900s, the Universities of Oregon, Kansas, Texas, and Nebraska followed the lead of the Universities of Chicago and Wisconsin by adapting and implementing correspondence course work and extension programs.

The University of Wisconsin had the mission of taking education to the greatest number of persons. Through extension programs, the University of Wisconsin provided a way of educating people outside of the university setting. Their focus was on public schooling, meeting the needs of an industrial society, and growing labor initiatives. Distance education also provided the way to reach various people groups, recruit students, and provide learning opportunities on the crucial topics of the day. Constantly struggling with acceptance by mainstream academia, distance education maintained quality and high standards to make this educational format more credible. Although correspondence and extension programs did not receive full acceptance, the off-campus work that provided learning at the turn of the century provided the foundation for today's distance learning (Larreamendy-Joerns & Leinhardt, 2006; Pittman, 1991; Watkins, 1991).

Distance Education Matures

During the 1920s, correspondence study educators gained professional identity. This brought legitimacy to correspondence course work. With the advancement of technology and the growth of industrialism, professional and vocational training enabled extension and correspondence courses to gain in popularity, to increase in number, and to gain much needed recognition. By the 1930s correspondence course work was more accepted than in years past. This included many companies, labor unions, and the U.S. Army and Navy. Local, state, and federal welfare programs also used distance education. Correspondence course work helped provide higher education and training during the depression era. Soon the need for universal standards and guidelines became evident, thus the formation of the National University Extension Association (NUEA). The first

meeting held was in 1915 at the University of Wisconsin, Madison. Even though distance education was gaining acceptance, leadership positions received significantly lower pay than similar positions of other programs. There still existed a lack of commitment by institutional leadership to fully support distance education. The low credibility for correspondence study programs also fostered small staff, low wages, and inadequate resources. Course study guides were not standardized and there was little research to support this method of learning and the needed pedagogy. A pivotal point occurred at the second International Conference on Correspondence Education (ICCE), held in October 1948. As a result of this conference, deliberate efforts set into motion professionalizing the field. The fourth ICCE began addressing standards, preparation, pedagogy, methodology, administration, and the labor and trade unions. The fifth ICCE, 1957, focused on defining terms and practices, developing procedures, encouraging research, and sharing information and experiences throughout the world. Distance education had come of age (Larreamendy-Joerns & Leinhardt, 2006; Watkins, 1991; Wright, 1991).

Another indicator of distance education's recognition came with the formation of the United States Armed Forces Institute (Watkins, 1991). The government and military accepted distance education and provided learning possibilities for service persons. During the 1950s, the USAFI was the largest adult education program in the world. The University of Wisconsin, Madison, served in this program through its extension department. Using technology with distance education moved this learning format beyond its first phase.

Technology

Starting in the 1920s technology began influencing learning. VanKekerix and Andrews (1991) discussed that with new technologies, expectations were mixed as to the impact on distance education. Often many would be joyous about the potential that existed; yet, apprehension over early failures and untested waters prevailed. Such was the case in the mid 1900s with technological advancement. Technology was potentially a great possibility for correspondence courses, but the effect was less than ideal. This may have been due to lack of educator involvement and use, as well as unforeseen challenges. For example, technology such as radio and television quickly became too expensive as the American government began allowing commercial based interests and groups to capture the medium. However, 1960s and 1970s had an increase in attempts to reach students using technology. Many put too much trust in media's ability to influence and motivate students. Sharing the same thoughts, Watkins (1991) indicated that the use of radio technology in distance education did not last long. As America grew and began using more technology, radio course work slowly eroded. Public stations were broadcasting with more power causing interference for low powered college stations. Funding and governmental paperwork also became great obstacles to maintaining broadcasts.

Defining Online Higher Education

Many distance education course offerings began to migrate to an online format during the 1990s. The new modality became known as online learning, e-learning, or distributive education; education that took place while student and instructor were physically separated, and that used technology and the Internet to promote learning and

communication. The mixture of distance education, human-computer interaction, instructional technology, and cognitive science turned out to be online education removing barriers of time and space (Distance Learning Task Force, 1999; Hrastinski, 2008; Parsad, et al., 2008). Technology equipped distance education for real-time communication. Internet connectivity moved learning beyond the traditional classroom or lecture hall (Eaton, 2002; Shale, 2002; Web-Based Education Commission, 2000; Wenxian Zhang, 2002).

The Internet added an alternative access to higher education (Martindale & Ahern, 2001; Web-Based Education Commission, 2000). This new format permitted learners with Internet access to obtain educational materials at nearly any time and in any place (Wingard, 2004). Online higher education was greatly different from the traditional classroom learning setting. The distinctions challenged the traditional educational format dominant within higher education. Online education took learning outside of the college and university walls. Adeyemi and Osunde (2005), Garet, Porter, Deimone, and Yoon (2001), Shale (2002), and the Web-Based Education Commission (2000) indicated that higher education cannot meet the demand within a global knowledge-based society without the use of the Internet and online education. Matheos and Archer (2004), and Poley (2008) noted that today's adult learners were education consumers. These new consumers used the information they accessed through Internet connectivity to make education decisions that best fit their needs of work and life. Matheos and Archer, and Poley indicated that it had become necessary, then, for higher education to rethink and restructure itself in order to meet distance education and adult learners' demand and needs.

Garrison (1985) described three generations of distance education. The first generation was the slow asynchronous/correspondence era. Communication between student and instructor was by postal mail, which required lapses of time. Study was individual due to communication time. The advantage was greater flexibility for learners in completing course work as long as mail service was available. The second generation was the synchronous/teleconference era. Professor and student communicated through audio- or video-conferencing. Group instruction was possible and individual consultations or tutoring occurred via telephone. Due to restraints of the technology, students often were required to go to a remote campus location for the audio/video presentation. The third generation was the fast asynchronous/microprocessor era. With the use of Internet tools and applications, communication between learner and professor could be real-time (synchronous) or delayed (asynchronous). Computer and Internet were tools and a foundation for learning. Group and one-on-one interaction was possible asynchronously and synchronously. There was great flexibility for students as they were able to work on their own schedule from any place where there was an Internet connection and computer.

Regardless of the era, distance education found itself trapped between opposing perspectives. The tension was between those who saw education as taking place only within classrooms and those who believed education was possible outside the classroom setting. Meyer (1975) and Pittman (1991) discussed how the dichotomy between on and off campus learning may have kept distance education restrained and limited. However, distance education continued in spite of rejection and eventually was recognized by the 1948 International Conference on Correspondence Education (Wright, 1991). Regardless

of the challenges, according to Larreamendy-Joerns and Leinhardt (2006), distance education continued to serve adult learning needs and allowed higher education to reach people who normally would not have access to higher education.

Distance Education Virtually

Adams and Morgan (2007), Fox (2007), and Shale (2002) discussed how over the years distance education slowly moved from correspondence to computer assisted learning to online learning known today. Since the 1990s, rapid growth and use of distance education occurred as Western modern society increased its reliance and integration of technology: computers, communication, and Internet. With these new technologies, real-time communication was now available in distance education. Consequently, distance education matured from correspondence courses to course work being offered using the Internet. Distance education through technology use became known as online education (Adams & Morgan, 2007; Fox, 2007; Shale, 2002). Not only was technology being used for distance education, but was also being incorporated into traditional classroom settings (Gaytan, 2008; Shale, 2002).

Online learning allowed for meaningful learning even though student and teacher were separated geographically. Online learning grew at such a rapid rate, it was suggested that one day online education would provide learning literally anytime and anywhere (Annetta & Shymansky, 2006; Harsh & Sohail, 2002; Lee & Nguyen, 2007; Uzunboylu, 2007; Weiyuan Zhang, Niu, & Jiang, 2002). Therefore, many persons who normally would not have access to education took advantage of online learning. Correspondingly, there was a rise in adults over the age of 25 taking classes. These learners were working toward a degree or for professional learning. Open university and

open learning allowed for lifelong learning possibilities (Annetta & Shymansky, 2006; Bird & Morgan, 2003; Bocchi, Eastman, & Swift, 2004; Duncan, 2005; Harsh & Sohail, 2002; Pierrakeas, Xenos, Panagiotakopoulos, & Vergidis, 2004; Vergidis & Panagiotakopoulos, 2002). Annetta and Shymansky (2006) estimated from the United States General Accounting Office data that within the next few years "the number of students over the age of 30 will outnumber students who are 18 to 20 years old" (p. 1098).

Online Higher Education Providers

Traditional colleges and universities were not the only institutions offering online higher education. With the introduction of online education, for-profit organizations began to offer course work for academic credit and degrees. Data showed a continual increase in online enrollments and an increase in organizations offering web-based learning and courses (Wenxian Zhang, 2002). For example, Crozier (2001) indicated that an increasing number of schools, colleges, and universities incorporated some type of web-based learning. A study for the National Center for Education Statistics indicated for the academic year 2006-2007 that 29% of the 4,200 institutions surveyed offered degree programs online and that 17% offered certificate programs online (Parsad, et al., 2008). Of 2-year and 4-year Title IV degree-granting postsecondary institutions (those receiving federal education funds), Parsad et al., reported that 66% provided web-based learning of some type. The Distance Education Training Council (2007) reported that most institutional leaders stated the outlook was strong for online education and that it would continue to grow. The Council further stated that institutional leaders expected online education to become mainstream education.

Many types of institutions offered online education. Parsad et al. (2008) provided categories based on federal regulations of Title IV degree-granting institutions. These institutions grouped into public 2-year, private for-profit 2-year, private nonprofit 2-year, public 4-year, private non-profit 4-year, and private for-profit 4-year institutions. Parsad et. al. found that 61% of institutions offered fully online courses and 35% offered hybrid/blended learning courses. The remaining organizations offered other forms of distance education such as correspondence courses. To delineate institutional data further: 24% were public 2-year, 12% private for-profit 2-year, 14% public 4-year, 36% private nonprofit 4-year, and 7% private for-profit 4-year. The remaining 7% were comprised of private nonprofit 2-year schools. The study further found the two most reported factors for offering online education were meeting student demands (68%) and providing alternatives for those not able to take traditional course work (67%). Howell, Williams, and Lindsay (2003) found that for-profit institutions surveyed had growing enrollments and that they comprise 33% of all online enrollments.

Online Higher Education Categories

The Distance Education Training Council (2007) found that academic leaders believed online learning was growing and that it would become a mainstream educational format. Allen and Seaman (2007b) found that improving student access was the primary reason for offering online courses and degrees. The second reason was increasing the degree completion rate. Allen and Seaman stated further that their study indicated 83% of academic leaders believed online enrollments would continue to increase. From their study, Allen and Seaman found five institutional classifications of online offerings based on how institutions offered online learning.

Not Interested: Institutions that do not have any online offerings and do not believe that online is important to their long-term strategy.

Non-Strategic Online: Institutions that have some online offerings, but do not believe that online education is an important part of their long-term strategy. Online courses tend to be outside of core educational areas.

Not Yet Engaged: Institutions that do not yet have any online offerings but cite online as a critical long-term strategy for their institution, and will most likely offer some sort of courses.

Engaged: Institutions that currently have online offerings. These organizations also believe that online education is critical to their long-term strategy for their institution. However, these institutions have not yet included online educational offerings in their formal strategic plan.

Fully Engaged: Organizations that have online offerings that they critical for their institution and that include online education as part of their strategic plan. (Allen & Seaman, 2007b, p. 9)

Distance Education Summary

Throughout the history of American distance education, education pioneers led the way for new formats of learning. Distance education in its many forms—correspondence, independent study, extension, videoconference, and so forth—forced educational change throughout the world (Matheos & Archer, 2004; Wedemeyer, 1991; Wright, 1991). Distance education changed over the years by slowly moving from correspondence to computer assisted learning to present day online education (Feasley, 1991; Gaytan, 2008; Lim, et al., 2006). Watkins and Wright (1991) presented different

eras of technology used in distance education. During 1920-1940s, radio was the technology used for education. The 1960s brought experimental use of film, video, slides, television, and telephone conferencing. Greater and faster advances in technology constantly challenged higher education for incorporation into learning plans and methods. It was through distance education efforts that educators were able to explore educational uses of technology.

Throughout its history, distance education faced many obstacles. Larreamendy-Joerns and Leinhardt (2006) and Pittman (1991) summarized the challenges faced by distance education and indicated that traditional academic resistance to change was perhaps the most rooted barrier. Distance education also faced presumptions about quality, even though there were no reviews of content and format. Distance education was democratic in nature in that it provides education for those outside of the academy. However, institutions that had the charge to educate persons were against distance education. Higher education, especially research-based institutions, often saw itself as elite in its actions and purpose, which separated the school from those who were not part of the organization. Lastly, educators often viewed quality education as contingent upon the proximity of the learner to the controlled classroom. Even though distance education withstood the tests, many of the historical challenges against distance education are still faced today.

Adult Learning

Poley (2008) discussed how educational providers needed to reconsider existing structures and policies to address future educational needs. These new needs were the result of demographic and societal changes as a global economy took form. Jones,

Voorhees, and Paulson (2002) indicated that today's adults were looking for educational opportunities that met their needs by allowing learning any time any place. To meet modern adult learning needs, institutions and educators needed to work outside traditional structures and standards (Bishop & White, 2007; Web-Based Education Commission, 2000).

Needs for Today's Adults

As discussed, today's adult learners face societal, work, and educational challenges not faced by prior generations. Employers expect a more educated workforce, thus making it necessary for adults to become lifelong learners (Hrastinski, 2008; Poley, 2008). Discussed by DiMartino and Castaneda (2007), knowledge was crucial for the adult worker. Equally critical were applied skills and the ability to apply learning to various settings. Today's skills and knowledge included oral and written communication, time management, critical thinking, problem solving, personal accountability, and interpersonal skills. The Web-Based Education Commission (2000) discussed how e-learning, or online education, permitted adults the ability to gain education while still maintaining employment and family commitments. One specific example provided was from the United States Army. The Army responded favorably to online educational access for its troops. The learning was not limited to for-credit course work, but also included continued training and development, keeping personnel current on knowledge and skills related to their duties. The Commission further discussed how online education met many adult educational needs, and stressed how institutions should now focus on any time any place, and on demand learning so that learners' needs may be met.

The Online Adult Learner

Based on 2000 Census data, Hussar and Bailey (2008) projected overall higher education enrollments through 2017. It was estimated that those 25 years of age and older would have the greatest enrollment growth. Those in the 18-24 year old range would increase 10%, those 25-34 years old by 27%, and those 35 years of age and older by 8%. Indications were that nontraditional-aged student enrollment was rising more than those within traditional educational settings. Allen and Seaman (2007a) and Howell, Williams, and Lindsay (2003) presented similar findings.

The Distance Education Training Council (2007) found from a survey that for degree-granting institutions, the average online learner's age was 37. Ninety percent of those adults enrolled were employed. Of those adults enrolled, 36% of them had tuition paid by their employer. For non-degree granting institutions, the average age of learners was 37, with 73% employed and 34% enrolled receiving tuition assistance from employers.

As reported by multiple sources (Amarsaikhan, Lkhagvasuren, Oyun, & Batchuluun, 2007; Fox, 2007; Lee & Nguyen, 2007; Reisetter, LaPointe, & Korcuska, 2007), the typical online learner was 30-39 in age. Degree work, professional development, or combinations of the two were reasons stated for seeking education. Online learners tend to be graduate level students. Because of employment and other life commitments, flexibility of scheduling, convenience, and coordinating career and life goals were critical elements in seeking education. School and classes had to be convenient and fit within persons' schedules. These reasons denoted nontraditional or adult learners who were involved with and had commitments to family, work, and

society. Howell, et al. (2003), stated that other motivations included professional advancement, external expectations, service to others and causes, relationships, escape, stimulation, and interest in the subject. These older learners were looking for learning that fit life, fit their schedules, coincided with their responsibilities, and was very relevant and current.

Allen and Seaman (2007b) found that online enrollments were growing at an annual rate of 1.5%. This was more than overall enrollment in higher education. The learner profile was quickly changing as older nontraditional adult learners were enrolling more for higher education course work, stated Howell, et al. (2003). In addition, most stated that adult learners brought with them prior earned credits and may hold a degree.

Relevant Learning

Zhang (2002) indicated adult learners were looking for active and relevant learning correlated with life and work needs. Kim and Bonk (2006), and Sanders and Morrison-Shetlar (2001) stated how modern adults were looking for immediate access to knowledge and resources. Further, to adequately meet today's learning needs, educators and institutions needed to find the correct mix of pedagogy, technology, and support, keeping the learner as the central force or reason for providing learning opportunities that are relevant and engaging.

Garet et. al. (2001) found today's adults required professional development that focused on content in order to match the need of the learner. This would have the greatest impact in meeting learning needs. The more closely training or education related to the actual application of learned knowledge and skill, the greater the influence of the training or education, and the greater the positive impact on outcomes and job performance.

Howell, et al. (2003), reported that employers expected the workforce of today to continually cycle through learning and retraining so that employee knowledge and skills matched workload needs and met the demand. Also reported by Howell, et al., the demand for learning was not limited to for-credit course work. Professional development may also include continuing education and training. Therefore, learners were looking for online learning classes and programs meeting their personal and work related needs (Kim & Bonk, 2006).

Technology

Computer and Internet use, as reported by Snyder, Dillow, and Hoffman (2008), steadily rose since the Internet and computer boom of the 1990s. Usage rose from 64% in 1997 to 85% in 2003. Technology and mobility were now partnered allowing persons to access information nearly any place and any time. Technology components merged so that personal data assistants, laptops, mobile smart phones, and wireless connectivity were now more usable, easier to carry in one device, and provide nearly instant access to resources through wireless technologies. Howell, et al. (2003), stated that with technology, mobility, and easy access to information and knowledge, today's adults became educational consumers looking for the best opportunity to meet their needs. Taking learning to students was now a function that institutions and educators must adapt so learners' needs were met. E-learning through the Internet was a tool, which empowered and equipped educators and institutions to take learning beyond the confines of traditional campuses (Web-Based Education Commission, 2000).

Virtual Seat Time, a.k.a. Credit Hours

As discussed, at the end of the twentieth century many changes in technology and society occurred. These dynamics not only brought change to society and persons. Education equally experienced the forces of change. Perhaps the introduction of technology and Internet confronted education and its traditions the most, as education formats moved from traditional classrooms and lectures to learning opportunities outside the classroom by the use of technologies and Internet. Simply, education was no longer bound to the confines of campuses and classrooms.

Specifically associated with course work via Internet was the educational format of online learning. Vastly different from traditional forms, asynchronous online learning was based on instructor and student being separated by time and space, allowing learners more freedom where and when they learned and studied (Web-Based Education Commission, 2000). The traditional definition of a classroom was no longer valid. Additionally, tracking learning by use of the credit hour was no longer applicable (Maeroff, 1994, 2003). Closely examined recently was the awarding of credit hour values to courses (Scott, 2009a, 2009b, 2009c) (discussed in the following sections). Within the framework of traditional education, such actions were alarming. For online education, whose "class time" was not based on time in a seat, the ramifications were exponentially greater since online education could not clearly define the credit hour as five 40-55 minutes of class time per week, where students are with an instructor or lecturer for instruction (Shaw, 1993), or a total of 130 classroom hours for the year (Maeroff, 1994).

Credit Hour Defined

The history of the credit hour began in 1867. It was during this year that the United States Bureau of Education was formed as the result of The Land Grant Legislation. From that time and into the early 1900s, education within the United States grew rapidly without any centralized governance or standards. It was at that time in history when the current structure of K-12 and higher education developed. All of these dynamics and events created a vacuum for standards and criteria to measure learning and minimal requirements for entrance into secondary education. Recommendations by the National Education Association suggested that 14 standard units of credit be required for college entrance. Each unit equaled a minimum of 130 instructional hours (Heffernan, 1973; Lorimer, 1962; Shedd, 2003; Wellman & Ehrlich, 2003a, 2003b; Wolanin, 2003). The credit hour measured the amount of time students were involved in instruction, lecture, or classroom study for a given subject. For example, one credit hour was equivalent to 130 hours of contact time in one subject. At the time the unit was established, 14 units, or four years, were necessary to complete the minimum high school preparation to enter college. The original purpose of the unit was to provide uniformity between all existing and new schools opening in America during the late 1800s and into the early 1900s.

Acceptance and Adoption

The Carnegie Foundation for the Advancement of Teaching was a driving force for many aspects of America's educational systems. The Foundation promoted the unit, or known then as the Carnegie Unit, and made it the base of their financial awards to schools and colleges; thus, the association with the foundation. The Carnegie Foundation

provided monies for pension funds. The Foundation used the unit as a way to categorize and set criteria for institutions taking part in the pension fund. As a result, educational institutions designed entrance standards and class standards to comply with the Carnegie Unit. In order to make their students eligible for college admission, high schools also adopted the Carnegie Unit as their standard. The unit controlled the length of class periods, the length of a school day, the length of school terms and year, and part of admission standards (Carnegie Foundation, 2008; Maeroff, 1994; Web-Based Education Commission, 2000). The Foundation built on the National Education Association's 14 standard units by associating educational support funding with acceptance of the unit. The Foundation stipulated in 1906 that colleges and schools had to endorse and accept the admission requirements set by the foundation, in order to qualify for faculty pension funds. Receiving Carnegie funds was crucial, since many schools and colleges could not afford retirement plans for instructors. More than 75% of the United States schools and colleges adopted the Carnegie Unit, what became known as the credit hour, by 1931. Foundation actions not only promoted the credit hour, but established national standards for education (Shaw, 1993; Watkins, 1991).

It was understandable that the Carnegie Unit was a simple metric that provided years of tracking information and used as an evaluative tool. Mullin (2001) showed that the current credit model had been accepted because of ease of use, but was quick to point out that it failed learning on many levels. The unit forced administration and instructors to place emphasis where it should not be, as well as using the unit itself to measure learning.

Questioning Credit Hour Use

A dialogue, or debate, about the credit hour may have begun in the early 1900s when an article by Leory T. Patton (1945) was published. Patton's first argument was that the credit hour did not truly mean an hour. Instead, the credit hour standard was that for every student hour spent in class, two hours spent in preparation for a total of three learning hours. In addition, the same standard applied that for every credit hour of class, student accumulation of class time and study/preparation time equaled 48 hours per week per class. Patton's argument continued by stating that the credit hour system was unsatisfactory, since it was not a true measure of time and did not measure education.

The credit hour designed measured the amount of class time students accumulated, thereby standardizing American education. Shaw (1993) defined the credit hour as the equivalent of five 40-55 minute classes per week lasting throughout the year. Instructional time equated to 130 hours, which was the same as the original unit discussed (Maeroff, 1994). As learners successfully progressed through classes, credit hours were tracked to meet educational standards and minimal standards for college admission requirements (Mullin, 2001).

The credit hour became the base for today's educational calendars, financial aid, and accreditation. As discussed by Maeroff (1994), Meyer (1975), and Web-Based Education Commission (2000), the Department of Education, in an attempt to facilitate nontraditional learning, defined the instructional week as 12 hours of regularly scheduled instruction, class time, examinations, or preparation for examination. The issue was that educational regulations and practices in place today were designed to support the educational institution, not the individual learner. Funding for institutions and funds

awarded to learners were associated with the regulations from eras past; neither focused on the learner and learning needs. The argument presented was that measurements of learning should not be measured by any other element than the learner's abilities and learning outcomes. Time became the measurement of learning. For example, four hours of a subject did not take into consideration what should be learned in those four hours. As the result, instructional time arranged to class organization and time. The credit system did not provide for learning formats that involve experience. With the focus on time, mastery of a subject was not the sign of learning. For distance education, especially online learning, the concern was how to award credit for activities that were not within the traditional classroom format. DiMartino and Castaneda (2007) emphasized that the Carnegie Unit and its influence negatively impacted the United States educational system by placing emphasis away from measuring learning and application of learning. In 1993 Boyer (1993), then president of the Carnegie Foundation argued that the Carnegie Unit was counterproductive and obsolete.

R. Watkins and Schlosser (2002) noted that over the past century the United States educational system used the credit hour—time standard or time-based system—to measure learning. However, with the introduction of instructional technologies and distance education, the credit hour was no longer able to adequately measure educational activities. Maeroff (1994), Meyer (1975), and Web-Based Education Commission (2000) presented arguments that the educational regulations and practices in place today were not designed for the individual learner or non-class time learning. As the result, the arrangement of instruction was to a set class time. For online learning, and other nontraditional educational forms, the concern was how to calculate and award credit hour

values to courses that did not use “class time.” This was reiterated by Poley (2008) when discussing how the credit hour did not justifiably provide any measure of learning outside the normative classroom and time in class.

The Internet was capable of moving learning outside of the classroom and beyond campus and institution. Therefore, as argued by Adams and Morgan (2007), Armstrong (1994), DiMartino and Castaneda (2007), and Web-Based Education Commission (2000), current educational standards, measures, and systems needed to be overhauled, placing focus on the learner and learning while allowing for various forms of learning. Similarly, Kintzer (1973, 1975, 1996), argued for a system that recognized all learning regardless of form, purpose, or place so adults may receive recognition for, and take count of, all their learning. Meyer (1975) discussed how adults were required to learn more and more outside of the classroom. The traditional learning metric could not adequately measure nontraditional forms of learning. Like Kintzer, Meyer stated that learning recognition must include life/work experiences and knowledge, competencies, and skills gained outside the classroom. The current credit hour system was not able to measure beyond traditional classroom time and learning.

Existing educational standards and regulations used the traditional classroom structure as a base. The Internet was capable of moving learning beyond the confines of classroom walls. Therefore, the entire educational system, standards, and practices would need to be overhauled while placing focus on the learner and learning needs, which allows for varied educational formats. Educational standards changed over time. One such action was moving away from the credit hour to measure education toward an outcome-based measure. Doing so would permit future modifications based on evidence

gathered from student achievement and school practices. In order to accomplish transformation, an extensive review of existing systems was required followed by systematic alterations. All stakeholders must have a say and share influence in the change needed; it cannot be the top-down approach often experienced with current governmental actions (Adams & Morgan, 2007; Armstrong, 1994; DiMartino & Castaneda, 2007; Web-Based Education Commission, 2000). From a systems theory advantage, Mullin (2001) noted that even though there have been many changes implemented in educational systems, none have resulted in significant modifications in the institutions, learning for students, and measured learning outcomes. True change could not occur until the entire system was modified. Transformation could not occur by incrementally altering the existing structure. The current functioning system could not produce any more than it already had. True change could not occur until the creation of new desired results. There had not been any significant system modifications since the early 1900s. With today's knowledge-based society and the impact of globalization, new standards, practices, and designs were needed incorporating technology and the Internet (Adams & Morgan, 2007; Web-Based Education Commission, 2000).

More recently during 2009, the Department of Education questioned how higher education institutions used credit hour values. Scott, Office Inspector General of the United States Department of Education, issued notices against three regional accrediting agencies: (a) Middle States Commission on Higher Education (2009b); (b) Commission on Colleges of the Southern Association of Colleges and Schools (2009c); and (c) Higher Learning Commission of the North Central Association of Colleges and Schools (2009a).

The DOE found that each of the agencies lacked in defining credit hour value, and in supporting and upholding their institutions' use of credit hours.

Specifically, a report on the Middle States Commission on Higher Education stated:

> We found that Middle States [Commission] does not have minimum requirements specific to program length and does not have minimum requirements for the assignment of credit hours. The lack of requirements could result in inflated credit hours, the improper designation of full-time student status, and the over-awarding of Title IV funds.
>
> Middle States senior staff stated that their main focus was on student learning outcomes; however, we did not find that Middle States provided any guidance to institutions and peer reviewers on minimum outcome measures to ensure that courses and programs are sufficient in content and rigor. (Scott, 2009b, p. 2)

The second report issued by Scott (2009c) stated similar findings of the Commission on Colleges of the Southern Association of Colleges and Schools (SACS). Scott stated that while the Commission

> Has a clearly defined minimum standard for program length in terms of credit hours, it has not defined what constitutes a credit hour…[However,] without defining a minimum standard for credit hours, SACS cannot ensure that its standard is being consistently applied (p. 3).

An Alert Memorandum (Scott, 2009a) specifically addressed how the Higher Learning Commission of the North Central Association of Colleges and Schools had not operated

with the best interest of students by granting initial accreditation to a for-profit institution. In doing so, the Commission could not guarantee the quality of education for the private for-profit institution.

Lew (2003) issued a report to the Assistant Secretary within the Office of Postsecondary Education (OPE), Department of Education. Lew reported that the OPE did not have sufficient checks and controls in place to assure that OPE consistently and accurately evaluated accrediting bodies. OPE, as reported, did not require agencies to have established policies, procedures, and practices in place. Lew continued to report that discrepancies existed between agencies and how educational quality was ensured. Lew continued in the report that OPE did not have standards nor documents that aligned a common credit hour definition for all agencies. Also reported, was the lack of concrete values for credit hours. Lew's conclusion was that OPE did not manage itself properly thus resulting in insufficient oversight of accrediting agencies ensuring appropriate credit hour use.

Not All Credit Hours Are Equal

Patton's (1945) argument was not limited to students and instructors. Institutions also had issues concerning credit hours. Even though a commonly accepted practice and definition of the credit hour was in place (discussed previously) not all institutions equally assigned credit hour values, nor did institutions unconditionally accept another institution's credit hour values. What one institution determined as three credit hours was not likely to be the same value at another institution. The result was students having difficulty transferring credit when necessary. Miller (2007) indicated that more than 40% of higher education students transferred at least one time before completing an

undergraduate degree. Barriers existed that made it difficult for learners to move between institutions. What was often the case, students lost credit hours due to the next institution not accepting unconditionally prior credits earned. Each institution followed their own guidelines in assigning course credit values and how to accept credit hours from other organization. Each educational organization placed value on credit hours based on the level of a course, required or elective for program and/or degree, and perceived importance of a course. Differences increased as learners moved between regions, depending on whether the institution was regionally or nationally accredited (Buchen & Le Cornu, 2005; Miller, 2007; Poley, 2008). The result of these differences and lack of uniformity, according to Miller (2007), ultimately penalized students who must pay for more education, repeat course work, and even delay graduation. Buchen and LeCornu (2005) reiterated the same discussion and explained that the learner was the one who suffered when transferring from one institution to another, because the decisions about transference of credit were arbitrary and based on few concrete criteria. Further diversity of institutions, faculty and administration perceptions, culture, and regional differences were factors affecting credit hour values and transference of credit hours.

Credits and Lifelong Education

Miller (2007) hoped that a uniform system would one day be developed and put into place so that students and institutions could benefit from the multiple layers of learning needed in today's society. Learning at various organizations would allow for recognition and transference of prior learning. Kintzer (1997a, 1997b, 1999) also argued for a system that was not only horizontal between institutions, but was vertical also, recognizing learning and giving "credit" for all levels of learning regardless of when,

where, and how education occurred. Adeyemi and Osunde (2005) indicated that institutions must continually review policies and practices to meet today's demand for learning and to meet learning needs. Hickman (1999) and Web-Based Education Commission (2000) argued that America's educational system is in need of a total restructuring that will align policies, standards, practices, and systems in line with meeting learning needs and staying current with society and the workplace.

Chapter Summary

Lifelong education, whether it was for credit, continuing education, or professional development, was important for today's learners. Employers sought educated persons that could meet the continually changing need within a global landscape. Asynchronous online education was one form being used. Also, online learning was able to meet educational needs by eliminating barriers to education that adults find (Hrastinski, 2008; Poley, 2008). Asynchronous online learning and other nontraditional educational formats were needed to meet learning needs, job training, and changing societal elements. Adeyemi and Osunde (2005) and Garet, et al (Garet, et al., 2001) strongly urged for a simplified, unified, and encompassing system so that all learners may be able to track all learning and have it recognized and counted equally. The current credit system, as emphasized by Adeyemi and Osunde (2005), was not capable of tracking lifelong education at a time when that all learning must be recognized in today's world. The result of this lack was giving adult learners an educational handicap. The responsibility of higher education, as argued by Meyer (1975) and Web-Based Education Commission (2000), was to assist and assure that all capable persons seeking education have the opportunity, and that all learning was examined, recognized, and justly counted

toward degree work, certification, and general education. A new system, then, would unify traditional and nontraditional forms of education so that all learning was accounted and used for recognition. The Commission emphasized that learning and learners could no longer be limited to the physical wall of the academy and that education become available as learners needed and wanted knowledge.

CHAPTER 3

METHODOLOGY

This chapter describes the methodology used to conduct a research project about asynchronous online education. What follows is the detailed framework involved with data collection and data analysis. Descriptive sections divide the research design into methods and strategies. These sections are research design, sampling, data collection, data analysis, validity and reliability, and research bias and assumptions.

The purpose of this study was to determine how higher education organizations determine class time for asynchronous online education and how that class time was converted to credit hours. The specific questions that guided this research project were:

1. What methods do national and regional policies set forth for determining the translation of asynchronous online class time into credit hours?
2. What methods do public higher education system policies set forth for determining the translation of asynchronous online class time into credit hours?

To discover answers to the research questions, content policy analysis design was used.

Design of the Study

Data collected were expected to provide definitive policies that existed and were being practiced routinely by regulatory agencies and higher educational systems. For purposes of gathering and understanding data, this project built its research foundation on qualitative policy analysis by examining contents of documented policies. Doing so

provided procedures for collecting data from multiple sources while preserving data sources. Findings from the many sources were compared, plotted, and tabulated for analysis. This arrangement showed the quantity of agencies and public higher education systems with established definitions and policies in regard to establishing credit hour equivalence for asynchronous online education.

Studying organizational documents and policies related to awarding credit hours were chosen for this study. This methodology provided a basis of operation for research. The procedures of the project were used in order to understand what was occurring in higher education relational to credit hour assignment for asynchronous online education. Bogdan and Biklen (2007) explained,

> *Methodology* [italics in original] is a more generic term that refers to the general logic and theoretical perspective for a research project. *Methods* [italics in original] is a term that refers to the specific techniques you use, such as surveys, interviews, observation—the more technical aspects of the research. (p. 35)

It is by its nature, that content policy analysis research allowed for data discovery from many possible document types beyond the boundaries of statistical inquiry. Here, "the term *data* [italics in original] refers to the rough materials researchers collect from the world they are studying; data are the particulars that form the basis of analysis" (Bogdan & Biklen, 2007, p. 117). Therefore, content policy analysis provided collection of descriptive data. Gathering data was accomplished by a "systematic, purposeful, and disciplined process of discovering reality structured from human experience" (Sharan B. Merriam & Simpson, 2000, p. 5) to discover data concerning credit hour translation for asynchronous online education.

As policy analysis research provided focus on the purposes of the research, methods were what guided the project. Research questions and strategies were the approaches that best met the need for gathering data. Denzin and Lincoln (1994a) explained, that researchers choose instruments that gather data and provide the working structure of the project. The nature of the research dictates methods of the project, the questions asked, and the context of the study. Thus, this qualitative policy study began with surveying the national Department of Education's web site and documents, then systematically moved to regional accrediting commissions' web sites and documents, and then public higher education systems' web sites and documents. Progressing from a broad national review to specific systems guided the research process, beginning with general data and moving to specific data. A purposeful sampling emerged through this process as criteria were met. Persons contacted to arrange a structured interview were from accrediting organizations and public higher education systems within the sample. The collected data were analyzed to address the research questions.

Policy Analysis as a Theoretical Frame

The design of the research project was policy analysis. The definition of policy analysis is dependent on the perspective one chooses. In general, policy analysis comes from a concern with the way governing bodies regulate through policies: the causes, the processes, and the impact of policies. Policy analysis was comparative in nature by holding one document and its meaning against other documents and their meanings (Rose, 2002). Musick (1998) discussed how policy analysis was a formal discipline within the field of education. Musick also defined policy analysis as an evaluation of a method, program, or policy relational to its effectiveness and successful outcomes or

results. Further, policy analysis had two primary dimensions: the first focus was on the contents of any given policy, which resulted in analysis of the text within the policy, the impact of the policy, and/or the results of the policy; the second focus analyzed the process involved in forming, ratifying, and implementing a policy. The desired outcome of a policy analysis created distinction between analysis and evaluation.

Geva-May and Pal (1999) argued that a difference existed between policy analysis and policy evaluation. An analysis was directed and functioned in terms of a political base and priorities. The purpose of analysis, then, was to choose the best alternatives from among a set of possibilities based on evidence, reason, inquiry, and intuition to resolve a public problem. Analysis was influenced by advocacy from diverse views, and was time and context specific. The analyst, therefore, chose words and conducts "analysis" wisely in relation to the given context. Evaluation, according to Geva-May and Pal, was research oriented and was not easily influenced by political atmosphere and pressure. Evaluation adhered to strict research methodologies for conducting objective research. Data collected by the evaluator were considered sound and reliable as established by research protocols. Policy evaluators studied original data and were focused on a specific research problem and guided by established research questions.

In contrast, Smith (2002) argued that policy "evaluation can be more than a litany of dry and unengaging data; at its best it can capture and reflect the many voices with which stakeholders speak" (p. 40). It was this reality, which Smith argued, that policy analysis could not be used separated from policy evaluation—as defined above—and vice versa. Any person working with policies would be aware of the political dimensions and

the overall context of the policy. Therefore, if policy analysis was offering recommendations and policy evaluation was reporting facts, then these two concepts were not clearly delineated. The duty of the evaluator, or analyst, was to provide data that may be used in making policy related decisions.

Within this project the more general definition of policy analysis was used, aligning the terms evaluation and analysis to refer to the combined meaning and function. In addition, the content of policy was the focus of the research instead of the procedures of policy. Examining contents of policies that were systematically and rigorously collected, allowed the researcher to link to other forms of scientific inquiry, permitting the researcher to generate understanding from data found within policy content (Bogdan & Biklen, 2007; Hesse-Biber & Leavy, 2006).

Purposeful Sample

To triangulate is to determine the trustworthiness of the data (Bogdan & Biklen, 2007). In order to accomplish triangulation with data collected and findings as the result of content policy analysis, structured interviews were conducted from a purposeful sample. For this research project, triangulation was used to check data and findings from various sources and from multiple methods in order to verify what was collected (McCulloch, 2004). As data were collected, established criteria determined which higher educations systems formed the purposeful sample group (details discussed in following paragraphs). Bogdan and Biklen (2007) defined purposeful sampling as the researcher choosing "particular subjects to include because they are believed to facilitate the expansion of the developing theory" (p. 73). Denzin and Lincoln (1994b) explained that purposive sampling was when a researcher deliberately sought out groups, persons,

and/or settings in which the process being studied was commonly found. Further, purposeful sampling required constant comparison between all the groups, persons, and/or settings under study. Doing so would show concepts for the researcher to consider and study further.

The established, purposeful sample criteria were based on the progressive process described previously. First, the U.S. Department of Education (DOE) was used to begin the research due to its national oversight and governing responsibilities related to accreditation and higher education. The second layer of the sampling was the regional accrediting agencies. The DOE recognized the regional agencies as the primary source of accreditation. Additionally, regional commissions were more general in nature instead of being content and field specific. The six regional accrediting bodies were: (a) Middle States Association of Colleges and Schools; (b) New England Association of Schools and Colleges, Commission on Institutions of Higher Education; (c) North Central Association of Colleges and Schools, The Higher Learning Commission; (d) Northwest Commission on Colleges and Universities; (e) Southern Association of Colleges and Schools, Commission on Colleges; and (f) Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities (U.S. Department of Education, 2009). Thus, interviews were conducted with persons representing the six regional commissions.

The final criteria for the sampling focused on for-profit and public higher education systems. Characteristics were data collected from the Integrated Post-Secondary Education Data System (IPEDS) (National Center for Education Statistics, 2010). Appendix A provides information about IPEDS and the data available. At the time

of the research project, IPEDS 2008 data provided the most recent and complete data set available, whereas data sets that were more recent were not finalized and complete. Several IPEDS conditions were used to filter data: (a) higher education systems that resided within the 50 states of the United States; (b) systems that were accredited by one of the six regional accrediting commissions; (c) systems that were either public, 4-year or above, or for-profit, 4-year or above systems; (d) systems that offered 4-year bachelor degrees; and (e) total enrollment provided by the institution. See Appendix B for search criteria used to conduct IPEDS queries. Based on the conditions presented and on total enrollment, the top ten for-profit and public higher education systems were chosen to complete the sample. Appendix C lists the top for-profit systems with enrollment counts while Appendix D lists the top ten public higher education systems' information.

Data Collection

Because data collection is important to all research projects, it was essential to make plans on gathering, cataloging, storing, and retrieving data. This project collected policy content from institutional and agency web pages, structured interviews, and photocopies or prints of official institutional documents. Telephone and email were used to make initial contact with regional and system participants, to set up interview appointments, to clarify any information that was deemed unclear on its meaning, and to find further information as needed. Data were stored as digital audio files, digital document files, and hard copy files of printable materials. All data were cataloged and organized using Endnote software. All data were securely stored.

Secure data storage was controlled by following several procedures. First, digital files were limited to one primary source. Protection of the computer was by use of

passwords and firewall protection. Digital audio files made during telephone interviews were transferred from the recording device to the secured computer after each interview. The file on the recording device was erased. Re-formatting of the recording device memory occurred after all interviews were secured onto permanent secured storage. Back-up copies of digital files were assigned to an external hard drive. The back-up system included an encryption method and required passwords to access. The data transfer during back-up procedures were conducted using a wired system instead of wireless. Hard copies of documents and notes were secured in locked storage cabinets.

The primary data for this project were documents collected from institutions and through interviews. Bogdan and Biklen described documents as the

> Memos, minutes from meetings, newsletters, policy documents, proposals, codes of ethics, dossiers, students' records, statement of philosophy, news releases, brochures, pamphlets, and the like….Much of what we term official documents are readily available to the researcher, although some are protected as private or secret. (pp. 136-137)

Because policy analysis involved studying contents of documentation, Bogdan and Biklen's description was also applicable for this research.

McCulloch's (2004) policy and document analysis corresponded with Bogdan and Biklen's statement, and indicated that historically, document analysis, in this case policy analysis, was mainly about "written" documents. With the advancement of technology and the Internet documents were no longer only on paper. Electronic formats provided many more possible sources of documentation. Thus, web pages were as much part of the data collection as formal printed documents. Many of the documents collected were

found through searches of organizational websites. Other documents were provided electronically through e-mails or from web links provided by interview participants.

Marshall and Rossman (2006) discussed how document analysis involved the analytic approach of content analysis. Documents that were found in many electronic forms became the materials for content analysis. The strength of policy content/document analysis was that it was unobtrusive and did not cause the researcher to disturb the setting. A weakness of this analysis was that the researcher may over-interpret and draw conclusions that were not truly text based. Therefore, it became necessary for the researcher to compare with other research sources to assure fair deductions. Interviews were included in the research to triangulate document data. It was through constant comparison that the researcher was able to provide checks and balances to the project and findings. Comparison began from the beginning of the data collection and continued until the project was completed (Bogdan & Biklen, 2007).

National Review

As discussed previously, data collection began by reviewing the United States Department of Education's website (www.ed.gov), the federal governing education body for the nation. Web search and review followed a regimented protocol assuring consistency between all web searches. Provided in Appendix E is the web search protocol used for national, regional, and system level searches. Displayed in Appendix F is an organization checklist used to ensure that all searches were conducted similarly. Information was gathered on credit hour definition and credit hour use—especially within the context of online education. Another avenue of inquiry focused searches for information about online education and guidelines established relative to course

development and assigning credit hour values. Web pages and documentation found were converted into Adobe Acrobat Portable Document Format file (PDF). All resources were cataloged using Endnote software, noting access date, URL, agency or institution, and so forth. The PDF file was attached to its corresponding Endnote reference. Paper copies of documents were made, cataloged, and filed to correspond with the Endnote reference. Specific notations about the documents were made into the corresponding Endnote record, printed, and kept with its matching paper file.

Regional Review

Examination of regional accrediting agencies' documents was the second phase of data collection. This review followed the same standards of the national DOE search (see Appendix E and Appendix F for details of searches and data collection). As previously noted, there were six primary regional accreditation bodies within the United States that were accepted and viewed as providing the principal accreditation needed for any educational institution. The Organization Checklist was used to assist in collecting information consistently from all institutions. Documentation and pages collected from the various commissions' websites followed the same data collection and cataloging process as discussed within the prior national review section.

System Review

The third phase of research involved focusing on for-profit (see Appendix C) and public (see Appendix D) higher education systems as defined in the purposeful sample. The same data collection process for national and regional organizations was followed for systems. Appendix E and Appendix F provide details of searches and data collection. The first round of investigation began by seeking information on how each system defined

credit hours and credit hour use—especially within the context of online education. A second search and review of data were made to examine how systems translated asynchronous online education into credit hours. Documentation and pages collected from the various systems followed the same data collection and cataloging process as discussed previously in the national review section.

In order to determine whom to contact for each system careful examinations were made of IPEDS data and each organization's information to find contact information. Each of the accrediting commissions and each of the top ten for-profit and public higher education systems were contacted asking for participation with the project. Appendix G provides a sample e-mail sent to each organization. Initial contact with the accreditation agencies resulted in many interview appointments being made. Follow-up was made as needed by using additional e-mail messages and telephone calls to secure appointments for interviews. The same process occurred with the public higher education systems.

Making contact with the for-profit systems provided many challenges. Following the steps used in contacting the regional commissions and public systems did not provide any contact with persons representing the for-profit institutions. Extra attempts were made in hope of gathering data from these systems. Additional e-mail messages were sent. Several telephone calls were made. Letters also were sent via U.S. mail services; a sample letter provided in Appendix H. The response rate to inquiries was extremely low. One system did respond by e-mail stating that corporate policy did not permit participation in research. A second for-profit system sent an e-mail requesting more information about the project. After several exchanged messages, the contact sent word that the system was beginning discussion on credit hour assignment and determinations,

and thus would not be able to participate at this time. A third for-profit system did respond by letter. The information received indicated a specific person and contact information. Several attempts were made to contact the designate person by telephone, e-mail messages, and a letter. None of the communications were responded to by the designated contact. The other for-profit systems did not respond to any of the numerous requests for participation. Telephone contact information found normally directed the telephone call to a switchboard operator or a call center. These persons were not able to respond to my request nor were they able to redirect my call to another person. Any information that may have been mentioned was already found on the organization's website. Following these negative experiences and the lack of substantial data from searches moved the project focus to the other agents described in the purposeful sample section.

Interviews

As discussed, a purposeful sample was used to conduct structured interviews with persons representing the regional accrediting agencies and the top ten public higher education systems. Interviews were conducted with persons representing respective commission and public system. Initial contact was made through e-mail using information provided by the institution's web site (see Appendix G for a sample e-mail). If no response was received within one week, a phone call was made to the same contact information found for the e-mail message. If the person was not available, voice mail was left indicating the researcher's contact information, the nature of the telephone call, and a brief synopsis of the research project. If it became apparent that response from the initial contact was not possible, another person's information was found for communication

purposes following the process discussed previously. When a person indicated that another person should be contacted for an interview, inquiry was made for the contact information of the referred person believed better suited for the task.

After an interview was set, the person was sent a confirmation e-mail message stating time and date of the telephone interview. The message also asked that any web links or document files that might help understanding the organizations policies would be forwarded. Appendix I provides sample email with reminder message and consent form for an interview. Approximately one week before the scheduled interview, a reminder message was sent with a copy of the interview questions attached. Appendix J contains interview questions sent to participants. Appendix K provides the interview form. As a follow-up to the interview, a thank you note was sent to each participant. Several of the participants asked for results of the research project. Notation of those requests along with contact information was stored for future use.

The protocol above was designed to provide data that triangulated with the policy and web data collected in the prior phases of the project. Following University of Georgia's Internal Review Board (IRB) guidelines and standards, participants' identity and related data were protected. Data collected were used for research purposes only. See Appendix L for IRB submittal and approval.

Data Analysis

Foundation to this study was content policy analysis. This type of analysis involved comparative and inductive analysis as described. From the beginning of data collection to the final write up, information findings were compared against other sources of data collected. Constant comparison was part of policy analysis as defined previously

by Rose (2002). The constant comparison procedure described by Rose was found consistent with Bogdan and Biklen (2007) and McCulloch (2004). Through collection of data and analysis, assessment of the information was held against previously found data. Marshall and Rossman (2006) also considered how policy analysis allowed for and best provided information when data were evaluated against other resources. In doing so, similar themes would emerge as well as differences in the records.

Researcher notes were used to provide consistent data collection. Forms were created to track information and provide a checklist of investigative tasks for each organization reviewed. Communication templates were also developed and used to provide common language to institutions (See Appendices E, F, G, H, I, J, and K). It was through comparison that common elements became apparent. These were noted as analysis continued and were evaluated during the study. The same was true for any differences that were found. The results of this protocol were to provide a systematic research plan, data collection, and analysis addressing the research questions. Triangulation of data was possible through interviews and comparative analysis, which included data from documents and interviews.

Since the purpose of this study was to learn how regulatory organizations and public higher education systems translated online education "time" into credit hours and to specifically determine what methods policies contained for determining the translation of asynchronous online class time into credit hours, data collection was systematically conducted in three levels: national, regional, and system. From these distinct tiers data were collected and analyzed to respond to the research questions and provide understanding of the credit hour definition and use.

National Review

Data collected first were from the national level of education governance within the United States; that was, the Department of Education. Data gathered and analyzed from this agency provided the base definition of credit hour and commonly held practice within American higher education. Also, data were reviewed looking for answers to how the credit hour could be calculated and used for traditional and asynchronous online educational settings. More specifically, data were reviewed to respond to the following questions:

1. Did the agency provide a published definition of the credit hour to its institutions/organizations?
2. What published guidelines did the agency have for calculating credit hour value for traditional and online education courses?
3. In the absence of published materials, what were established practices to address the above questions?
4. Who was responsible to ensure consistent application and use of credit hours?
5. As related to credit hour values, what changes did the organization foresee, or made, as the result of U.S. Department of Education's Program Integrity Issues: Final Rule, October 29, 2010 (34 CFR Parts 600, 602 603, et al.)?

These questions guided investigation of data to learn how each agency guided its institutions in determining credit hour value for traditional and asynchronous online education course work.

Regional Review

The second phase of data analysis was conducted with the information gathered from each of the regional accrediting agencies listed. These governing bodies were responsible to oversee and provide accreditation to institutions providing education to all levels of learning from K-12 through higher education. Data gathered were reviewed for credit hour definition and information on using the credit hour, as presented in a previous section. Guiding questions were used to assist in finding data:

1. Did the agency provide a published definition of the credit hour to its institutions/organizations?
2. What published guidelines did the agency have for calculating credit hour value for traditional and online education courses?
3. In the absence of published materials, what were established practices to address the above questions?
4. Who was responsible to ensure consistent application and use of credit hours?
5. As related to credit hour values, what changes did the organization foresee, or made, as the result of U.S. Department of Education's Program Integrity Issues: Final Rule, October 29, 2010 (34 CFR Parts 600, 602 603, et al.)?

These questions guided investigation of data to learn how each agency guided its institutions in determining credit hour value for traditional and asynchronous online education course work.

System Review

The third phase of data analysis involved focusing on public higher education systems as defined in a previous section.

1. Did the agency provide a published definition of the credit hour to its institutions/organizations?
2. What published guidelines did the agency have for calculating credit hour value for traditional and online education courses?
3. In the absence of published materials, what were established practices to address the above questions?
4. Who was responsible to ensure consistent application and use of credit hours?
5. As related to credit hour values, what changes did the organization foresee, or made, as the result of U.S. Department of Education's Program Integrity Issues: Final Rule, October 29, 2010 (34 CFR Parts 600, 602 603, et al.)?

These questions guided the investigation of data to learn how each system guided its institutions in determining credit hour value for traditional and asynchronous online education course work.

Data Analysis Summary

Together the three levels of data collection were designed to provide analysis of regulatory bodies from the national level to regional accreditation, and then to public higher educational systems. This design permitted comparison of the various levels of governance and action showing the quality, control, and comparable credit hour definitions and uses between various levels of American higher education.

Validity and Reliability

The policy analysis chosen for this project analyzed policy and document content from multiple higher education organizations. Clear research standards were in place assuring validity and reliability of the project. Such protocol would indicate to readers the

accuracy of research methods, findings, and possible application of findings. The following section defined the standards that were used to assure validity and reliability.

Merriam (1995) defined validity in terms of internal and external. Internal validity pertained to how accurately and similar was research findings in relation with reality. External validity refers to how generalizable or applicable was findings beyond the setting of the research. Charles and Mertler (2002) added to these definitions by indicating data should measure what was intended based on the research and that the given data source was authentic.

External validity was a small concern for this research. As described previously, data were collected from official documents and web pages indicating what an organization stated as policy and procedure. Therefore, there was no randomization, pretest and post-test comparison, multiple treatments factors, and setting effect (Merriam & Simpson, 1995a, 1995b). Generalization of findings across higher education was possible. However, the intent of this project was to find and report what was occurring per organizational policies shown through documentation and interviews.

Internal validity was a major factor of the project. Therefore, several techniques were used to strengthen internal validity. The first procedure that was used involved a checklist so the same searches were conducted for information. Second, interviews from academic professionals representing their organizations confirmed findings gathered from respective organization's documentation web site. Lastly, presenting research assumptions and biases for the reader revealed how the researcher's perspective may have influence data collection and analysis.

Charles and Mertler (2002) defined reliability as the extent to which data were consistent and the results were true to data collected. This was easily provided in quantitative research as other researchers may find similar data correlating consistency. Within policy analysis research, data were considered reliable as consistency was shown between the data. Policy analysis researchers carefully use protocols that assured trustworthiness of data collected. Since the majority of data collected came from various organizational web sites and official documents, deliberate actions assured preservation of data. Data collected and analyzed followed the procedures discussed in prior sections, permitting readers the opportunity to review data. Lastly, research notes recorded provided an audit trail on how searches for data were conducted and how data were collected, preserved, cataloged, and analyzed.

In summary, validity concerns congruency of findings with reality and generalizability of findings. Reliability is the authenticity of data sources and consistency between findings and collected data. In order to strengthen validity and reliability, research notes were made, prescribed protocols were followed, and collected web pages and documents were preserved for future review. Lastly, researcher assumptions and biases were revealed as explicitly as possible.

Researcher Biases and Assumptions

The belief that it is possible to completely dismiss one's worldview and beliefs poses possible difficulties for any researcher. Yet, as Olesen (1994) discussed, one's assumptions and biases were part of who any researcher was as a person. Just as skin, eyes, and ears are part of the person, so were assumptions about the world in which one lives. Also, biases were resources that may provide insight to understanding and

interpreting data. However, the researcher must be "sufficiently reflexive" (Olesen, 1994, p. 165) in order to be aware of a personal influence on the research and to guard against tainting the data and findings. Thus, it was the researcher's responsibility to work as objectively as possible and to reveal upfront one's own perspectives and worldview. It was from this stance that this research project was conducted.

An assumption I brought to this project was that asynchronous online education is an accepted form of learning. If sound pedagogy is used and the learner is dedicated to learning in the virtual format, then asynchronous online education outcomes are equal to that within a classroom structure. Secondly, the world in which we live is becoming more of a global society than at any other time in history. As such, learning for the adult becomes as important as having employment to support living. Third, lifelong learning will better equip adults in a constantly changing and challenging world. Lifelong learning, what is gained outside of formal education, is as important as "academic" learning, and should be incorporated into a person's educational record. Fourth, online education holds the potential to meet adult learning needs in that it allows for a more flexible "class" schedule that aligns more with working adults' schedules, work and family demands, and is more accessible than traditional classroom learning.

My worldview holds that learning is possible from all of life and all the experiences one encounters. As such, I consider myself an educator whose "classroom" is not limited to a location at a set time and place. One of the degrees I earned includes asynchronous online education. Having positive experiences with online learning created an affirmative inclination toward asynchronous online education. Providing instruction using online education is one format I regularly use. One course is offered through a

hybrid format; i.e., course work that incorporates asynchronous online education while requiring learners to come to campus periodically during the term. My teaching responsibilities also include courses that are supplemented by online resources.

The fact that this study was designed based on online education also indicates my interest in the topic. As stated, online learning can be a valuable tool for educators. It is the application of the instrument and the pedagogy that makes a difference for learning. I continually seek ways to improve my understanding of the field and for opportunities to improve my skills as an online educator. Knowing my propensity for online education is ever present in my thoughts. I, thus, attempt to make wise choices and decisions when conducting a study. I also practice research knowing that I may find data that is contrary to my stance and willing to examine the data to better understand an alternate view and continue my lifelong education.

Lastly, having worked mostly in nonacademic settings such as not-for-profit and corporate environments, I have perspectives that may be different than those who have purely academic careers. This, perhaps, allows for a new look at what is occurring within academia and the impact that globalization and newer educational formats have on scholastic endeavors.

Chapter Summary

This chapter presented the design, analysis, framework, and issues concerning validity, reliability, and research bias. The methods chosen provided the foundation to gather and review data concerning asynchronous online education and application of credit hours for virtual “class time.” Because today’s educational formats, such as asynchronous online education, allow for more learning dynamics beyond the traditional

lecture and classroom, research on credit hour application and use for asynchronous online learning format research was warranted and needed. In doing so, educational recognition of higher education's adult learners taking part in online education may be better addressed.

CHAPTER 4

NATIONAL AND REGIONAL POLICIES AND PRACTICES

The purpose of this chapter is to present findings from an examination of the U.S. Department of Education and regional accrediting agencies for answers related to Question 1 of this study: What methods do national and regional policies set forth for determining the translation of asynchronous online class time into credit hours? The findings were organized into two main categories: national findings and regional findings. Each of the main sections was then divided into subsections related to the data. Subsections used were credit hour definition, responsibility, translation policies, and section summary. As discussed in Chapter 3, policy analysis was conducted for this study. Regional accrediting agencies' representatives were interviewed. Their information was used to validate what was found in respective organizational documentation. Lastly, an analysis of national and regional findings will close the chapter and provide a response to Research Question 1.

During the research phase of this project, the Department of Education released a ruling that provided a "new" definition for credit hour. Consequently, depending on when interviews were conducted and documents collected, educational organizations and institutions were found to be in varying phases of adjusting policies, guidelines, and practices. Therefore, distinguishing between pre- and post-ruling credit hour definitions were noted within the national section. Because regional and institutional adoption of the

ruling was beginning, little difference was found in data gathered from agencies and organizations.

National Credit Hour Definition and Translation

Understanding the meaning and use of credit hours were foundational for this project. The project data revealed many aspects of a credit hour and its use. Once a basic definition was understood, analysis of how asynchronous online class time was translated into credit hours became possible.

As discussed in Chapter 2, a Carnegie Unit, now commonly known as a credit hour, originally was defined as five 40-55 minutes of class time per week where students were with an instructor (Shaw, 1993), or a total of 130 classroom hours for the year (Maeroff, 1994). The Carnegie Unit was introduced into U.S. education during the late 1800's. The credit hour design measured the amount of time students were involved in instruction, lecture, or classroom study for a given subject. The original purpose of the unit was to provide uniformity between schools and to measure minimal requirements for entrance into higher education (Carnegie Foundation, 2008; Web-Based Education Commission, 2000). The data indicated that a commonly accepted understanding was used within U.S. educational systems for measuring and tracking learning, and for assigning administrative duties such as faculty teaching load and cost analysis.

The U.S. Department of Education (DOE) created the U.S. Network for Education Information system in response to requests to have information centralized. DOE provides in that repository a credit hour definition and made this definition public through U.S. Network for Education Information (2008b, 2008c) (USNEI). USNEI documentation provided credit hour definition, application, and examples. Credit hours

also became known as credits, units, academic credit, and other similar terms. U.S. educational systems used varied methods or formulae in tracking, recording, and reporting student academic work, which were accrued toward the completion of certificates, diplomas, and degrees. Contemporary to its original meaning, a credit hour now generally was found as one instructional hour through lecture or seminar. There was variation on whether the total time included an additional two student preparation hours and possibly an additional time for work outside of class.

As explained in Chapter 2, the credit hour became a way to quantify learning in secondary schools for preparation into higher education. As will be discussed later, two of the regional accrediting agencies, New England Association of Schools and Colleges and Middle States Association of Schools and Colleges, were instrumental in adopting and using credit hours for educational purposes. Even though institutions and organizations were slow to adopt Carnegie Unit use, today's use of credit hour was found to be a vital element in the functionality of America's educational system.

Pre-Program Integrity Issues: Final Rule

Prior to October 2010, all U.S. higher educational systems and accrediting agencies used the credit hour. Basically, one credit hour equaled one instructional hour plus two student preparation hours. Assigning of credit hours to courses was based on judgment of faculty, administration, and regulatory organizations. This base definition guided U.S. educational efforts over the last century. In October 2010, the Department of Education released a ruling to address credit hour meaning and other issues within higher education. However, to better understand the new credit hour definition one must

understand the older forms in order to grasp current developments within U.S. higher education.

Credit Hour Definition

USNEI provided a credit hour definition to "represent a mathematical summarization of all work completed, and are not the same as the actual classroom contact or instructional hours" (2008c, ¶2). USNEI further discussed that units were used to track traditional academic classroom work and other types of learning ventures; such as, independent study, internship, laboratory work, and research. Credits were also used for assessing tuition, fees, and student status. In addition, credits were often used in calculating instructional cost per credit hour and faculty workload. The research data showed that the U.S. use of credit hours did not correspond to educational tracking used in other countries (U.S. Network for Education Information, 2008b). The study found recommendations that indicated careful consideration was needed when evaluating non-U.S. educational tracking systems. For purposes of transferring into American institutions, evaluations of foreign educational transcripts were completed often by credentialed independent reviewing organizations (U.S. Network for Education Information, 2008a).

Credit hours also were counted toward academic terms: fall and spring semesters with 15-16 weeks and summer semesters 10-12 weeks, as well as quarters 10-11 weeks with three or four terms per year (2008b, 2008c). Compared to other sources discussed in Chapter 2, USNEI basic credit hour definition did not mention any specific amount of time as found in the original definition. In order to maintain commonality within this

document and for purposes of discussion, a credit hour definition within a semester will be used to represent an academic term.

USNEI documents explained typical credit hour calculations for traditional lecture or seminar courses and for other types of course work such as laboratory, practice, independent study, studio, and internship. Traditional courses, such as lecture and seminar, were considered those in which learner and instructor were able to directly interact with each other, and met at set times at a designated place. This type of class was also labeled face-to-face, using the acronym F2F. The other types of courses—laboratory, practice, independent study, studio, and internship—were those where instructor and student may or may not have direct interaction and student learning was more experientially based (U.S. Network for Education Information, 2008a, 2008b, 2008c, 2008d). USNEI data portrayed the amount of time involved for a three credit hour course for a semester (see Appendix M). Time displayed was broken into time allotments per week for class, student preparation, and any extra time designated for learning. The information then provided total hours for the semester broken into time for class, student preparation, and any extra time designated for learning (U.S. Network for Education Information, 2008c).

Displayed in Table 4.1, the time involved in learning was that of one basic credit hour. Displayed in Appendix M, credit hours for different types of learning discussed previously were represented. Each type of learning category required various total amounts of learning time for students.

Table 4.1

Pre-Integrity Issues Credit Hour Values

	Time/Week			Time/Semester			
Learning	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Lecture or seminar 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Lecture or seminar 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs

Note. [a]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [b]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [c]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. Created from U.S. Network for Education Information. (2008). *Structure of the U.S. Education System: Credit systems*. Washington, DC: U.S. Department of Education. Retrieved April 10, 2010 from http://www2.ed.gov/about/offices/list/ous/international/usnei/us/credits.doc.

Considerations involved in granting credit hour values for prior learning took into consideration ten specific standards. For higher education, credit hours may have been awarded for learning that took place in military programs, employer training and certification programs, and other possible learning circumstances (U.S. Network for Education Information, 2008d). These standards were as follows:

1. Credit should be awarded only for learning and not for experience alone.
2. Higher education credit should only be awarded for learning at that level.
3. Credit should be awarded for learning that demonstrates theory and practical application.
4. Determination of competence standards and the decision to award credit should be made by appropriate academic and subject experts.
5. Credit should be appropriate to the academic context in which it is considered for acceptance.
6. Credit awards and recording should be monitored to avoid duplication.
7. Policies and procedures should be fully disclosed and available for review.
8. Fees for credit award procedures should be for assessments and not based on the amount of credit to be awarded.
9. Assessment personnel should receive adequate training and professional development opportunities.
10. Assessment programs should establish regular review procedures and a continuous improvement process.

USNEI also provided three possible resources for assessing learning outside of academy: (a) Council for Adult and Experiential Learning (CAEL); (b) College-Level Examination

Program (CLEP), and (c) College Credit Recommendation Service (CCRS) (U.S. Network for Education Information, 2008d, ¶4-6).

As illustrated in Table 4.1 and Appendix M, the credit hour base of one instructional hour and two student preparation hours outside of class was held across most of the learning types. It appeared that experiential type learning required more time of students than traditional class and preparation courses. This was exemplified in laboratory and other learning types. Prior learning had set criteria in order to be considered for credit hour value (see seriated list in prior paragraph). Credit hour assigned values varied by learning activity. The location of where learning happened also had an effect. For example, classroom instruction required the standard amount of time. Laboratory learning required more time for the same amount of credits.

Responsibility

The data showed that the DOE had the federal level of responsibility for overseeing education within the nation. National oversight included regional and specific accrediting organizations. The department relied on agencies' services to review and evaluate institutions for quality in educational offerings. However, it appeared that the DOE provided multiple definitions to agencies and institutions, and that the department may not have provided adequate oversight of accreditation agencies. Also, the DOE acknowledged that credit hour values would differ between institutions, but accepted this because of "acceptable practices" within higher education (U.S. Department of Education, 2010b; U.S. Network for Education Information, 2008b).

Not All Credit Hours Are The Same. Found in federal documentation were differences in awarding credit hours on an institutional level. For the same type and level

of class, credit hour values often differed. However, there was an "assumption that the basic academic content and student academic load [was] similar" (U.S. Network for Education Information, 2008b, ¶2) between the various systems and higher education schools. Further, differences in assigned credit value and assessment of another institution's credit hours regularly resulted in valued changes to credits by the receiving school when students move between institutions. Credit hour assignment and evaluation were not part of the DOE's responsibilities (U.S. Department of Education, 2010b), thus placing control of curricula, standards, and administration with states, districts, and regulatory bodies. The DOE's role was to supplement, compliment, and support those bodies governing U.S. education (U.S. Department of Education, 2010a). Therefore, the responsibility of credit hour assignment and management rested on local, system, state, and regional organizations, leaving the DOE to represent national interest and provide support for educational bodies. As a result of various organizations and institutions each determining credit hour values, no one credit hour equaled another in many circumstances. Students most commonly experienced this when transferring credits earned from one institution to another (discussed in a later section).

DOE Managerial Control. Lew (2003) issued *Memorandum: Final Audit Report* to the Assistant Secretary of the Office of Postsecondary Education (OPE) within the Department of Education. Lew's document indicated that OPE did not have sufficient managerial control of its evaluations of accrediting bodies. Further, OPE did not warrant that accrediting agencies had established policies, procedures, and standards in place for institutional compliance in meeting program length among other indicators. Requirement discrepancies between national accrediting agencies and regional accrediting agencies were found. The former required quantitative standards and measures for credit hour measure,

while the latter did not require measurable standards when determining credits. Lew (2003) stated, that OPE did not generally "concur with our findings and recommendations" (p. 2).

More specifically focused on OPE, Lew (2003) presented information that indicated OPE did not have standards nor documents that provided agencies and institutions with a credit hour definition or any criteria of a credit hour. OPE also did not require agencies or institutions to define and quantify credit hours and program length. Phrases found within Lew's report included "demonstrate that program length, clock hours, or credit hours…are appropriate for the degrees and credentials it offers" (Lew, 2003, p. 8); "following practices common to institutions of higher education in terms of both length and content" (pp. 8-9); and "common practice for institutions of higher education" (p. 9). Two of the agencies that were reviewed for the *Memorandum: Final Audit Report* did define "a credit hour in terms of the amount of instruction required, but neither specified the amount of outside preparation a student should be expected to complete for each credit hour" (p. 9). Because OPE did not address these issues it could not ensure that accrediting agencies were overseeing institutions appropriately as specific to credit hour definition, criteria, and use.

12-Hour Rule. The DOE issued what became known as the *12-Hour Rule* as a response to the amended the *Higher Education Act of 1965* and to provide greater freedom to institutions providing nontraditional programs. The focus shifted from five days of classes for an educational week to a week's education equivalent of 12 hours of instruction, examination, and exam preparation (Carnevale, 2002; Office of Postsecondary Education, 2001). Both the DOE and *Higher Education Act* provided parameters for higher education program length and the subsequent assignment of credit hour values. The ruling's learning time was displayed in Appendix M as a comparison to

previously defined credit hour values. The *12-Hour Rule* regulated a credit hour definition as follows:

> For educational programs using standard terms (semesters, trimesters, or quarters) or clock hours, the Department [DOE] defined a week of instructional time as any week in which one day of regularly scheduled instruction, examination, or preparation for examination is offered. For educational programs using nonstandard terms or nonterms, the Department defined a week of instructional time as any week in which at least 12 hours of instruction, examination, or preparation for examination is offered. (Office of Postsecondary Education, 2001, pp. 5-6)

However, the higher education community and U.S. Congress voiced concerns that the *12-Hour Rule* may have stifled education and innovation within education. Thus, the DOE committed to explore the issue and look for resolution (Carnevale, 2002; Office of Postsecondary Education, 2001).

With the DOE's decentralized structure it could not directly govern academic institutions. Instead, it relied on accreditation agencies and institutions to provide quality education meeting federal expectations (U.S. Network for Education Information, 2007). Accrediting bodies were seen as "gatekeepers" (Schray, 2008, p. 1) assuring that institutions and institutional programs met expected standards. How an institution assigned credit hours was part of accreditation administration. The DOE accepted accreditation as a tool "to assure [*sic*] that credits earned by transfer students from one higher education institution to another would be acceptable" (Schray, 2008, p. 2). Therefore, the responsibility for credit hour use was with regional accreditation agencies and local institutions, not the DOE.

As related to the *12-Hour Rule*, the DOE did not have the authority to enforce the ruling. Suggestions made from the higher education community indicated that reliance on accrediting agencies for quality assurance was needed. Schray (2008) presented information that accreditation agencies were addressing credit hour use by issuing guidelines to their constituents. However, comparability between traditional and nontraditional forms of education varied greatly by program and student. Schray suggested one possible metric that could be used as a common measure was learning outcomes or competencies. Schray concluded that even with the oversight, guidelines, and regulations there remained concern that today's educational formats greatly differed and that significant policy changes were in order.

Translation Policies

Over the years, the DOE reviewed issues and regulations specifically related to credit hours and distance education. The DOE indicated multiple times that change was needed. However, the DOE data and findings, consistent over many reports, showed no significant change demonstrating a lack of significant action and change within U.S. education. Simply, practices remained static.

DOE Managerial Control. Described in *Memorandum: Final Audit Report* (Lew, 2003) the Office of Postsecondary Education, DOE, did not have sufficient policies and procedures addressing accrediting agencies' institutional requirements regarding credit hour production and use. There was also a lack of consistency by OPE reviewers resulting in mixed determinations and allowances of accrediting agencies that did not support quality education. Lew (2003) reported there was a general lack specific to distance education modalities. A corrective proposal was for OPE to require of accrediting agencies "peer reviewers to confirm the institution's use of the Carnegie formula for determining credit

hours and report on the validity of justifications for any deviation" (Lew, 2003, p. 28). Suggested changes were needed to make policies and procedure consistent for all educational learning methods. It was recommended that OPE develop policies and procedures as well as require accrediting agencies to "provide institutions with written guidance on 'sound and acceptable practices' for assigning credit hours" (Lew, 2003, p. 27), and accrediting agencies' guidance to include "formulas for assigning credit hours" (Lew, 2003, p. 27).

12-Hour Rule. The historical background for the *12-Hour Rule* (Office of Postsecondary Education, 2001) included attempts to thwart fraud, especially with nontraditional forms of education, including asynchronous online education. The *12-Hour Rule*, was one effort to address the issue of fraud and nontraditional learning. The program defined an academic year "to include both a minimum number of credit hours for undergraduate students and a minimum length of instructional time for all students" (pp. 7-8). However, that definition was later removed. Another endeavor defined full-time undergraduate learning as a minimum of 24 semester hours (Office of Postsecondary Education, 2001; Student Assistance General Provision, 1994), but was later dismissed. The November 29, 1994, final regulations of the *Assistance General Provision* attempted to provide more flexibility with nontraditional education. The change allowed

> Twelve hours, rather than 5 days, of regularly scheduled instruction, examination, or preparation for examination occur in a week to be counted as a week of instructional time…. The Department did not establish a minimum number of instructional hours that must occur during that one day because, as stated in the preamble to the November 29, 1994 regulations, full-time students attending standard term programs were generally presumed to be in class attendance for at least 12 hours each week. This measure was derived from standards used in traditional education, where a

> certain amount of outside preparation was estimated to take place for every hour of classroom instruction. (Office of Postsecondary Education, 2001, p. 8)

The intended purpose of the *12-Hour Rule* (Office of Postsecondary Education, 2001) was to "define what constitutes a week of instructional time" (p. 5) in an attempt to address fraud and abuses related to instruction and program time. Specific to nontraditional learning, "educational programs using nonstandard terms or non-terms, the department defined a week of instructional time as any week in which at least 12 hours of instruction, examination, or preparation for examination is offered" (Office of Postsecondary Education, 2001, pp. 5-6). However, the DOE quickly learned through feedback from the higher education community that this rule inhibited education more than it helped. Focus groups were organized to discuss nontraditional education and issues that surrounded the *12-Hour Rule* use. During group discussions, the DOE realized, "*the key issue is how to make changes that allow the continued development of innovative educational programs while ensuring that the amount of educational instruction is adequate and comparable to that offered in traditional term-based programs* [italics in original]*"* (Office of Postsecondary Education, 2001, p. 6).

Focus group discussions included "quality" of nontraditional education programs, the amount of "time" and its use for instruction and financial aid, and how nontraditional education and terms did not coincide with student financial assistance programs (Office of Postsecondary Education, 2001, p. 13). Voiced also was how comparability between traditional learning and nontraditional learning was significantly different, making it extremely difficult to apply the same standards to both modalities. In the end, OPE was not able to resolve issues with the *12-Hour Rule*. Closing its report, OPE stated:

> The Department recognizes the need for significant policy changes in this area in order to increase access to innovative education programs that increase students' likelihood for success. In its report to Congress on the Distance Education Demonstration Program in January 2001, the Department raised several questions for consideration based on the emerging trends in postsecondary education, its discussions with the community and its experience with the Demonstration Program. Chief among these issues is "Is there an alternative to the '12-hour rule' that would ensure that the amount of instruction is adequate in the variety of ways that academic activity is organized in distance education?" However, the problem extends beyond distance education and includes traditional programs as well as innovative programs geared to meet the needs of working adults.
>
> Over the coming months, the new Administration will work with Congress to carefully consider the options for addressing this important problem, including the community's suggestion to eliminate the 12-hour rule and applying the one-day-per-week rule for all types of programs. At the same time, it will review the existing safeguards and controls for ensuring that the amount of educational instruction is adequate and comparable to that offered in traditional term-based programs. (Office of Postsecondary Education, 2001, p. 23)

Eventually, the *12-Hour Rule* was rescinded.

Demonstration Program. July 1999, the DOE initiated the *Demonstration Program* (Paige, et al., 2003; Riley, et al., 2001; Spellings & Stroup, 2005)

> (1) to test the quality and viability of expanded distance education programs currently restricted under the HEA [Higher Education Act]; (2) to provide for

> increased student access to higher education through distance education; and (3) to help determine the most effective means of delivering quality education via distance education, the specific statutory and regulatory requirements that should be altered to provide greater access to distance education, and the appropriate level of Title IV, student financial assistance for students enrolled in distance education programs. (Riley, et al., 2001, p. v)

During this program the DOE examined and tested changes in statutes that were affecting distance education such as the "50% Rule," which would make an institution ineligible for federal funds if more than 50 percent of courses were offered through various forms of distance education (Paige, et al., 2003; Riley, et al., 2001; Spellings & Stroup, 2005). Other waivers granted participating institutions to change academic term length, academic year length, a week of instruction (see *12-Hour Rule* discussed previously), and full-time student status. It was noted by Riley, et al. (2001) that the "50% Rules" were added to existing regulation in response to fraud and abuse of federal funds. As reported by Paige, et al. (2003) the DOE did not see any evidence that waiving the "50% Rules" and other related program waivers had "negative consequences" (p. iv) and that the DOE recognized laws and regulations needed to be amended.

During the period of the *Demonstration Program*, findings and updates were reported to congress through three reports (Paige, et al., 2003; Riley, et al., 2001; Spellings & Stroup, 2005). Findings reported indicated that distance education, including Internet-based educational offerings, were significantly different from traditional campus-based education. Therefore, it would be necessary to consider changes in current regulations, which were based on traditional brick-and-mortar institutions and classes.

The DOE reported that accrediting agencies had adopted standards and guidelines for institutions to use for distance education courses and programs (Riley, et al., 2001). More closely related to credit hour assignment and use, Riley, et al. (2001), reported that in regulations there was not a definition of "term." What was found instead was that "working definitions have evolved from what has been common practice in institutions of higher education" (p. 18). As such, "time" was discussed in the report by noting how federal aid and funds, regulated term length, and the *12-Hour Rule* hindered distance education and that consideration should be given when updating regulations. Examples of how time was a factor for many institutions was described when noting how institutions were attempting to meet adult educational needs by offering multiple start times during each year, allowing learners to begin coursework more appropriate to their need, holding year long programs, and competency-based learning (Paige, et al., 2003). Riley, et al. (2001), presented information indicating that Internet-based distance education had the "potential to expand the reach of higher education dramatically… [and] to increase access to higher education and to enrich academic activity" (p. 29). Likewise, Spelling and Stroup (2005) presented information that data showed distance education increased access to higher education especially for older nontraditional students and minorities. All reports noted that carefully thought out changes in regulations were needed (Paige, et al., 2003; Riley, et al., 2001; Spellings & Stroup, 2005).

Although all three reports noted how time, academic terms, and instructional length were a negative factor of regulations, none of the reports specifically addressed credit hour definition or the translation of credit hours for asynchronous education. there were no suggestions for other metrics to measure learning. Yet, all three reports

connected how time, terms, and instruction were directly related to federal financial aid and how regulations need changed to allow for educational freedom and to better meet the needs of learners and modern forms of education.

Pre-Program Integrity Issues: Final Rule Summary

Discussed in prior sections was how the credit hour definition evolved from its introduction into American education until a recent change took affect. Findings indicated that credit hours have three main elements: (a) class or instructional time, which was when instructor and student were at a set time and place for education lasting 40-55 minutes; (b) student preparation time; and (c) possible extra-class time for activities conducted in laboratories, practicing, and as determined by instructor. The awarding of credit hours occurred when students successfully completed courses. Recognition by certificates or diplomas occurred when students accrued sufficient credit hours.

From data it appeared that some credit hours were more credible than others as seen when learning time involved an instructor. This format was granted more credence than learning gained by students during preparation time and extra-class activities. For example, as displayed in Table 4.1, the traditional one instructional hour plus two student preparation hours was equal to one credit hour for a total of three learning hours. Learning that was experiential in nature, or application oriented, required more learning time per credit hour; e.g., one laboratory credit hour was equal to one instructional hour plus two student preparation hours plus one to two hours laboratory time for a total of four to six learning hours. There were also differences between institutions regarding credit hour values. This could occur when students transferred from institution to another. The receiving institution determined what were acceptable credit hour values from the

prior institution. Thus, the credits issued by the receiving school for prior course work at another institution often was a different value that what was originally earned.

Although the DOE attempted ventures in credit hour assignment and use—*12-Hour Rule* and *Demonstration Project*—there appeared to be a common expectation or assumption about the traditional credit hour, but actual application and use of a credit hour showed variation. In question was who had ultimate responsibility for credit hour assignment and use. The DOE did not have legal authority to enforce a set definition. Expectation, though, was for accrediting agencies and institutions to have policies that defined and governed credit hour use.

In the reports presented, issues of fraud by institutions were found closely associated with credit hour assignment and use. There was concern for how nontraditional forms of learning, such as asynchronous online education, account for quality and appropriate credit hours assignment. At the time, the *12-Hour Rule* was intended to provide more allowances for institutions as they began adopting nontraditional forms of learning. Regardless of learning modality, the DOE recognized limitations within current regulations and admitted that "significant policy changes" were needed. However, no lasting or significant changes with credit hour definition or use were found. Also, no information or policy was found for the assignment of credit hour values to asynchronous online education. There appeared a lack of substantive written definition, guidelines, and formulae for consistent assignment of credit hours. Instead, "sound and acceptable practices within higher education" appeared to be the basic understanding and guiding principle for credit hour values and use.

Post Program Integrity Issues: Final Rule

Over the 100 plus years of use, the common understanding of one credit hour equated to one instructional hour plus two student preparation hours. Even with this base practice, discovered in documents that credit hour assignments were interpretive and variable. As discussed in the following information, the loose definition of credit hour led to a change in regulations.

On June 28, 2010, U.S. Department of Education Secretary announced a notice of a proposed rule making entitled *Program Integrity Issues: Final Rule* (2010). Following the time allotted for public comments, the ending ruling was issued on October 29, 2010 and the effective date set for July 1, 2011. The ruling stated the Department of Education Secretary sought to improve program integrity within higher education. Rationale for the Secretary's action included comments and recommendation submitted during public hearings June, 2009 and those directly submitted to DOE. Additionally, other factors included U.S. Government Accountability Office reports (Scott, 2009a, 2009b, 2009c) that raised concerns and recommended more oversight by the DOE. The ruling (2010c) included many other elements. However, for purposes of this project only the information directly pertaining to credit hour definition and use is presented.

Credit Hour Definition

As found within the *Program Integrity Issues: Final Rule* (2010c), the newly defined credit hour:

> A credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than (1) One hour of classroom

> or direct faculty instruction and a minimum of two student preparation hours each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or (2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours. (Program Integrity Issues: Final Rule, 2010c, p. 66946)

Within the preamble of the ruling, discussion of the new credit hour definition was presented. Also, several months after the ruling was enacted, Ochoa, U.S. Department of Education Assistant Secretary, Office of Postsecondary Education, issued the *Dear Colleague Letter* (Ochoa, 2011) that further explained credit hour meaning and other questions about the ruling. Within these documents, the DOE stated that accrediting agencies must have policies and procedures to verify that each institution's credit hour values were acceptable and represented sufficient educational content. Institutions had the flexibility to assign student work, assess student learning, and assign credit hour values or equivalencies as long as work was equivalent to the amount of time defined as a credit hour, the content was rigorous and academically appropriate, and student learning was verifiable by objectives and outcomes. Time values associated with the ruling's value of one credit hour are displayed in Table 4.2 (see Appendix N for more detailed information).

DOE argued that the new definition was to establish a minimum standard for all institutions. The DOE further indicated in the ruling that "credit hours at one institution

Table 4.2

Post Program Integrity Credit Hour Values

	Time/Week			Time/Semester			
Learning	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Equivalent work 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Equivalent work course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include laboratory, internships, practica, studio, and other academic work. Created from *Program Integrity Issues: Final Rule*, 75 Fed. Reg. 66,890 (2010) (to be codified at 34 C.F.R. pts. 600.2, 602.24, 603.24, and 668.8); and Ochoa, E. M. (2011). *Dear Colleague Letter*. (GEN-11-06). Washington, DC: U.S. Department of Education. Retrieved April 23, 2011 from http://ifap.ed.gov/dpcletters/attachments/GEN1106.pdf.

will not necessarily equate to credit hours at another institution for a similar program" (Program Integrity Issues: Final Rule, 2010c), but the flexibility with the minimal basics made credit hours more equitable across academia. The DOE indicated that it did not believe many institutions would need to change their current credit systems.

Ochoa (2011) indicated that the new regulations were not invasive on higher education institutions' academic decisions nor the decisions of accrediting bodies. Further, the new credit hour definition was founded on traditionally accepted practices, but allowed for nontraditional learning formats such as asynchronous online education. Thus, a credit hour

> Is an institutionally established equivalency that reasonably approximates some minimum amount of student work reflective of the amount of work expected in a Carnegie unit: key phrases being "institutionally established," "equivalency," "reasonably approximates," and "minimum amount." A credit hour is a unit of measure that gives value to the level of instruction, academic rigor, and time requirements for a course taken at an educational institution. At its most basic, a credit hour is a proxy measure of a quantity of student learning. The higher education community has long used the credit hour, as defined by the Carnegie unit, as part of a process to establish a standard measure of faculty workloads, costs of instruction, and rates of educational efficiencies as well as a measure of student work for transfer students. (Ochoa, 2011, p. 2)

Ochoa then discussed how the new definition allowed flexibility for institutions and agencies while providing a common base of understanding for all. Therefore, by removing the credit hour's basic element of "seat time," organizational freedom of choice was permitted when represented by learning outcomes and measured student achievement.

Ochoa stated the new credit hour definition was nothing original:

> Credits may be awarded on the basis of documentation of the amount of work a typical student is expected to complete within a specified amount of academically engaged time, or on the basis of documented student learning calibrated to that amount of academically engaged time for a typical student. (Ochoa, 2011, p. 3)

Responsibility

The *Program Integrity Issues: Final Rule* (2010c) delineated responsibility between the DOE and accrediting bodies in that the DOE oversaw compliance as accrediting agencies performed reviews and checks of member institutions. Further, the requirement of state authorization for any distance learning program, including asynchronous online education, and as regulated in some states within the U.S., was portrayed as another way to ensure program integrity by institutions (Ochoa, 2011; Program Integrity Issues: Final Rule, 2010c). The DOE further stated that the new definition was "deigned to preserve the integrity of the higher education system by providing institutions, accrediting agencies, and State agencies…with the responsibility for determining the appropriate assignment of credit hours to student work" (Program Intrigty Issues: Final Rule, 2010c). Rationale described in the preamble of the regulation informed readers that the DOE enacted the ruling in order to take responsibility to protect taxpayer investment and learners' experiences, while at the same time allowing recognized accreditation commission as authorities to the quality of education offered by institutions (Ochoa, 2011).

Credit hour compliance, included in *Program Integrity Issues: Final Rule* (2010c), responsibility was placed on accrediting bodies and states to ensure acceptable

practices from institutions. Commissions' and states' responsibility were to determine if an institution appropriately and consistently applied credit hour values to courses and student work. Accrediting agencies and states were also charged with reviewing and evaluating institutional decisions about credit hours. The institutional burden was to determine the proper amount of credits for academic activities and work based on learning outcomes as proven by student achievement. According to the ruling, institutions were allowed freedom for alternative methods and measures as verifiable and comparable to the base definition: an equivalent to one instructional hour plus two student preparation.

As presented previously, the DOE did not have legal jurisdiction over accrediting agencies or institutions. The DOE could only supplement and support states, districts, and accreditation agencies and represent federal interest in the nation's educational systems (U.S. Department of Education, 2010a, 2010b). It was the legal right of the DOE to withhold federal education funds should the department believed an institution was not providing quality higher education (Ochoa, 2011; Program Integrity Issues: Final Rule, 2010). The DOE also had the right to remove its acceptance of an accreditation agency and/or or an institution, leaving student credit hours non-transferable due to the loss of federal compliance. With either action, federal education funds would no longer be available to an institution's student population (Program Integrity Issues: Final Rule, 2010). The absence of federal funds would result in students not having access to governmental student loans or government grants.

The DOE clearly stated that the recognized accrediting agencies were responsible for policing their memberships' compliance. In the *Program Integrity Issues: Final Rule*

(2010) agencies' responsibilities included "reviewing and evaluating the reliability and accuracy of…ensuring institutions' appropriate determinations" (Program Integrity Issues: Final Rule, 2010, p. 66845) of institutions' credit hour assignments. The same information was reiterated within the *Dear Colleague Letter* (Ochoa, 2011). The DOE indicated the ruling was not limiting or prescriptive but served as the basis to quantify all academic activity and ensure rigorous content alignment to match educational level. This would then be verified, as accrediting agencies were required to evaluate and assess institutions' programs and courses (Ochoa, 2011). In the ruling, the DOE offices would "further support accrediting agencies in fulfilling these responsibilities but do not prescribe the methods by which accrediting agencies must perform these evaluations" (Program Integrity Issues: Final Rule, 2010c). In his letter, Ochoa (2011) included an enclosure (see Appendix O) that provided guidelines for accrediting commissions for institutional reviews and reporting findings to DOE.

Institutions' responsibilities were to demonstrate that courses contained enough educational content and that learning activities were equivalent to the credit hour definition. More specifically, the DOE further indicated that institutions had freedom to develop and run their courses and programs as they elected (Ochoa, 2011). With the freedom of the new credit definition, institutions had the responsibility to demonstrate that a credit hour "represents a minimum acceptable level of academic activity for which credit can be awarded" (Program Integrity Issues: Final Rule, 2010c). Within regulation, institutions also were to have a process for determining and assigning credit hours. These processes, then, would be used to evaluate institutions' choices and values.

Translation Policies

As discussed in an earlier section, the ruling was an attempt by the DOE Secretary to improve program integrity within higher education. Comments and recommendations from the public and many higher education organizations were considered while constructing the ruling. Reports from U.S. Government Accountability Office also were included in forming the final released regulation (Scott, 2009a, 2009b, 2009c). The ruling not only defined the credit hour, but also placed responsibility on accrediting agencies and institutions for compliance with regulations. The ruling placed emphasis on credit hour assignment and use, while placing full responsibility on higher education organizations.

Ochoa (2011) explained in the *Dear Colleague Letter* why the credit hour definition was changed and how the credit hour connected to many other aspects of higher education, such as Federal financial aid.

> The definition of a credit hour for Federal purposes is necessary, in part, because more than $150 billion of Federal financial aid is awarded annually based on an individual student's enrollment, as represented in number of credits. The credit hour is a basic unit of student aid eligibility….However, the regulations are grounded in commonly accepted practice in higher education, do not intrude on core academic decisions made by institutions and their accrediting agencies, and are completely consistent with innovative practices such as online education, competency-based credit, and academic activities that do not rely on "seat time."
>
> The regulations reflect the Department's responsibility to taxpayers to ensure value for their investment, while respecting recognized accrediting

> agencies as the "reliable authorities regarding the quality of education or training offered by the institutions or programs they accredit." Significantly, these regulations were developed only after the Department's Inspector General conducted reviews at three of the seven regional accrediting agencies and found the oversight of institutional assignment of credit hours insufficient at all three agencies. (Ochoa, 2011, p. 1)

Ochoa further indicated that the new credit hour definition was not only for protecting Federal funds. The new definition was also "related to accrediting agencies' assessment of institutions' determinations of credit hours or other measures of student work" (Ochoa, 2011, p. 1). Further explaining the credit hour, Ochoa indicated the amount of work expected per credit hour is the same amount of work associated with the Carnegie unit.

> A credit hour is a unit of measure that gives value to the level of instruction, academic rigor, and time requirements for a course taken at an educational institution. At its most basic, a credit hour is a proxy measure of a quantity of student learning….In keeping with the original purpose of providing a consistent measure of at least a minimum quantity of a student's academic engagement….We recognize, however, that other measures of educational content are being developed by institutions, and we do not intend to limit the methods by which an institution may measure a student's work in his or her educational activities. We, therefore, are explicitly providing institutions the flexibility to demonstrate alternative methods of measuring student learning, so long as they

> result in institutional equivalencies that reasonably approximate the definition of a credit hour for Federal purposes. (Ochoa, 2011, p. 2)

In making these statements, Ochoa addressed concerns that were voiced by higher education institutions and organizations.

Continued in the letter, Ochoa made it clear that institutions were responsible for credit hour values, related content, and student workload. As part of their responsibilities, institutions were directed to gain acceptance and approval through peer reviews involved in the accreditation processes. Regardless of the definition and practice of each institution's definition and practice, the expectation was still that all student work and academic offerings were reasonable and approximated accepted practices found within higher education. Ochoa specifically stated "that there is no requirement that a credit hour *exactly* [italics in original] duplicate" (Ochoa, 2011, p. 2) the work and definition provided in the letter or the ruling. Additionally, institutions were responsible to associate any alternative learning, such as asynchronous online education, to acceptable credit hour values. Institutions were free to assign credit hour values to any learning since the new definition did "not emphasize the concept of 'seat time' (time in class) as the primary metric" (p. 3).

Although not explicit in the letter's section to institutions regarding their responsibilities, the expectation that institutions developed and maintained policies and documented procedures for determining credit hour values was placed in the ruling. Within the section addressed to accrediting commissions, standards for institutions were stated. However, the institutional requirements were within the ruling. The letter also clarified that within the ruling accrediting agencies were required "to conduct an effective

review and evaluation of the reliability and accuracy of the institution's assignment of credit hours" (p. 3). Additionally, the same responsibilities applied to State accrediting agencies that were recognized by DOE; i.e., "New York, Pennsylvania, Oklahoma, and Puerto Rico" (p. 4). Accrediting agencies were not required to review all course related documentation. However, agencies were mandated to review institutional policies and procedures in assigning credit hour values, and to gather and review sufficient sample documentation that provided an encompassing covering of an institution's programs, degrees, and courses.

Enclosed with the *Dear Colleague Letter* (Ochoa, 2011), were additional pages that reiterated many times the points in the main body of the letter. The additional text noted that institutions could use any type of measure to track student learning and completion as long as the measurement could be associated with:

> An amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than:
>
> 1. One hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or
> 2. At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution,

> including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours. (p. 5)

As an example, Ochoa listed several questions and answers that served as frequently asked questions with responses. “Question/Answer 4” directly answered credit hour use for asynchronous online education:

> Q.4. How would an institution apply the definition of a credit hour if the institution offers asynchronous online courses that are not also offered in a classroom setting?
>
> A.4. There is no "seat time" requirement implicit in the definition of a credit hour. An institution that is offering asynchronous online courses would need to determine the amount of student work expected in each online course in order to achieve the course objectives, and to assign a credit hour based on at least an equivalent amount of work as represented in the definition of credit hour. (p. 6)

“Question/Answer 5” regarded instructional time. The answer provided to the question, indicated that instruction time was “schedule[d] instruction or examination” (p. 7) that did not include “vacation time, homework, or periods of counseling or orientation” (p. 7). However, instructional time was when “a student [was] expected to be academically engaged through, for example, classroom attendance, examinations, practica, laboratory work, internships, and supervised studio work” (p. 7). Ochoa was specific when addressing instruction for distance education.

> Academic engagement would include, but not be limited to, submitting an academic assignment; taking an exam, an interactive tutorial, or computer-

> assisted instruction; attending a study group that was assigned by the institution; contributing to an academic online discussion; and initiating contact with a faculty member to ask a question about the academic subject studied in the course. Merely logging into the electronic classroom does not constitute academic engagement. (p. 7)

Ochoa stated further,

> Even though a student's homework, research, or other unsupervised student work is not considered in determining the weeks of instructional time in an educational program, such student work would be considered in determining the number of credits to be awarded for a student's coursework. (p. 7)

As shown, it appeared that Ochoa might have confused the elements of what was and what was not included in calculating learning time for translation into credit hours. The verbiage in the question/answers compared to Ochoa's comment on page seven of the letter showed a difference between qualifiers.

Post Program Integrity Issues: Final Rule Summary

The *Program Integrity Issues* (2010c) slightly altered the meaning of a credit hour. The basic structure appeared to be the same as prior definitions: one instructional hour plus two student preparation hours to equal one credit hour. The difference, as indicated previously, was the direction to include extra learning time for activities such as laboratory work, internship, practicums, studio work, and the like. As reiterated in the *Program Integrity Issues* (2010c) ruling and *Dear Colleague Letter* (Ochoa, 2011) an intent of the change was to allow greater flexibility within higher education course offerings while guarding against potential fraud. The key difference between original and

new credit hour meanings appeared to be assignment of credit hour values to the "equivalent" amount of learning work as traditional credit hour meaning, and that the work was "rigorous," "academically appropriate," "consistent" with higher education practices, and "verified" by learning outcomes and assessments.

The additional flexibility allowed in the new definition allowed asynchronous online education, and other forms of distance education, the options to use more creativity in course and program offerings (Program Integrity Issues Ruling: Final Rule2011; 2010c). Ochoa (2011) stated:

> The regulations are grounded in commonly accepted practice in higher education, do not intrude on core academic decisions made by institutions and their accrediting agencies, and are completely consistent with innovative practices such as online education, competency-based credit, and academic activities that do not rely on "seat time." (p. 1)

Ochoa continued to indicate that there was no "seat time" characteristic in the new definition. Institutions offering asynchronous online education and other nontraditional learning were allowed to determine appropriate credit hour values. However, only as long as the credits could be documented to show that the amount of student work was comparable with expectations of traditional credit hour values and common higher education practice. Ochoa reiterated the same message several ways within the multipage letter. Much of what was stated in the *Dear Colleague Letter* (Ochoa, 2011) reaffirmed much of the discussion found in the ruling's preamble (Program Integrity Issues: Final Rule, 2010).

In order to guarantee compliance, the DOE placed the burden on accrediting agencies to have written policies, procedures, and/or guidelines, and to police its member institutions. Institutions also were expected to have documented policies and procedures in place governing their credit hour choices and application.

This new credit hour definition was not found significantly different from those used in years past. As noted prior in this section, there was still the one instructional hour plus two student preparation hours equivalency for learning and study. However, the new definition did not include the extra learning time for experiential learning as described prior the ruling. The DOE documentation indicated that since there was not a seat time element that measured learning time, institutions might be more flexible in offering education. However, it was noted that "time" was replaced with the expected amount of academic engagement as if the traditional credit hour definition were in place and classroom time was used.

Regional Accrediting Agencies' Credit Hour Definition

Regional accrediting organizations were responsible to oversee and ensure that their member institutions were providing quality higher education and were following expectations from the DOE. Even though each agency had its own expectations and standards, it was through accreditation and reviews that the agencies oversaw institutions in order to guaranteed quality education. The accreditation and review processes included peer reviews, self-study evaluations, reviews for substantive change, and monitoring. These practices equipped accreditation agencies' work for maintaining the quality of American education.

As discussed in Chapter 3 interview participants were assigned random numbers to assist in providing confidentiality. Identity markers used for this document incorporated the letter ‘P’ for participant followed by the contributor's designation; e.g., P33. Information discussed during the interview that may have specifically identified a participant was altered in such a way to allow confidentiality, but maintained the participant’s message.

The following section presents findings gathered from the accrediting agencies that were described in Chapter 3. In addition to data from documents, findings learned during interviews with agency persons are provided. At the time of interviews, *Program Integrity Issues: Final Rule* (2010) may or may not have been issued. If the ruling was distributed, subsequent interpretive documentation from the DOE only was beginning to be issued. Not all interview respondents could include in their discussions the new credit hour definition of the DOE or explanatory statements from the DOE.

Although there were several persons, each representing their own agency, found within interview data was a commonality when defining a credit hour. This likeness was found to be the traditional credit hour definition discussed earlier in this chapter. There also were distinctions between each agency. Some participants referred consistently to their documentation while others elaborated more on what information could be found within documentation and the commission’s interpretation and application. All participants indicated documents their respective agency had for institutions to follow and for guidance in reviewing institutions for accreditation. All participants also discussed how peer reviewers evaluated institutions based on mission, Self-Study Evaluation statements, Federal Compliance Reports, the institution’s catalog, program

and course documentation, and other documentation the institution provided in support of decisions and actions.

Information presented in tables within the following regional sections provides credit hour data as related to one traditional unit and as used in earlier tables of this chapter. Much of this data were detailed more extensively in the Appendix. These instances will be noted for the reader.

Middle States Commission on Higher Education

The Middle States Commission on Higher Education (MSCHE) was within Middle States Association of Colleges and Schools (MSACS). The association began in 1887. The original mission of MSACS was to standardize college entrance requirements and establish a working relationship between colleges and preparatory schools. During early years of existence MSACS was instrumental in creating the Carnegie Unit, which became known as the credit hour (see Chapter 2). The ultimate work of the MSACS led to accreditation of institutions through its Commission on Higher Education (1919) and Commission on Secondary Schools (1921) (Middle States Association of Colleges and Schools, 2011).

Credit Hour Definition

Within MSCHE documentation were definitions related to this research project. Academic credit was defined as the "credit earned by students for successful completion of college-level courses and applicable toward degrees" (Middle States Commission on Higher Education, 2009d, ¶2). Further in the document the contact hour/clock hour was referenced and explained as "a unit of measure that represents an hour of scheduled instruction given to students" (Middle States Commission on Higher Education, 2009d,

¶40). The definition provided by MSCHE was from *The Integrated Postsecondary Education Data System* [IPEDS] (Intergrated Postsecondary Education Data System, 2011). MSCHE (2009d) explained that

> Credits are units earned by students for the successful completion of coursework. Although many college courses carry three or four credits for successful completion, some courses may result in fewer or greater credits awarded, depending on course complexity, length, and other factors. IPEDS defines Credit/Credit Hour as *A unit of measure representing the equivalent of an hour (50 minutes) of instruction per week over the entire term. It is applied toward the total number of credit hours needed for completing the requirements of a degree, diploma, certificate or other award* [italics in original]. (¶49)

In *Definitions of Higher Education and Accreditation Terms* (2009d) words and terminology associated with a credit hour were provided; i.e., "independent study credit hour" (¶74), "quarter credit hour/quarter hour" (¶97), "semester credit hour/semester hour" (¶106).

Within the document *Degrees and Credits* (Middle States Commission on Higher Education, 2009e) the definitions provided above for contact hour or clock hour, and credit or credit hour were repeated. However, the document provided more details about credit hours. Described in the document was how most U.S. higher education schools recorded and tracked all types of academic work with the credit hour. Credits were accumulated as learners work toward academic recognition such as certificates, diplomas, and degrees. Found in the document, credit hours were used "to calculate, record, and interpret the amount of earned academic or training credits" (Middle States Commission

on Higher Education, 2009e, p. 2). Following the descriptors just mentioned were several paragraphs "interpreting" credit hour values for semester terms and quarter terms. As described, school terms may have varied activities each holding its own type of value. A semester credit hour was established as a minimum of 30 instructional clock hours.

Six types of credit hours were defined in MSCHE documentation. The documents contained formulae or descriptors which were provided to institutions to calculate the amount of learning time needed to quantify a semester credit hour (Middle States Commission on Higher Education, 2009e). The commission's expected learning time for one credit hour is displayed in Table 4.3 (see Appendix P for a more detailed information).

In another section of the document, MSCHE delineated what constituted (a) laboratory credit hour (includes class/lecture, laboratory work, and student preparation); (b) a practice credit hour (this may include supervised clinical service, supervised teaching, supervised field work, visual or performing arts studio); (c) internship or apprenticeship credit hour (this may include negotiated time and work supervised by instructor and/or work supervisor where student work and performance is rated and possibly certified); (d) independent study credit hour (this may include negotiated time and work supervised by faculty who in turn assesses student work and performance based upon negotiated standards); and (e) competency-based programs (this includes predefined objectives in which student and instructor collaborate on meeting objectives, student work, assessments and evaluation, set time frame, and student-instructor interaction time) (Middle States Commission on Higher Education, 2009e) (see Appendix P for a more detailed display).

Table 4.3

MSCHE Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Lecture 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Lecture course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs
Seminar 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Seminar course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. Created from Middle States Commission on Higher Education. (2009). *Guidelines: Degree and Credits.* Philadelphia, PA: Middle States Commission on Higher Education. Retrieved April 17, 2010 from http://www.msche.org/documents/Degree-and-Credit-Guidelines-062209-FINAL%5B1%5DDec09.pdf.

MSCHE (2009e) did allow institutions freedom for alternative ways of measuring academic work. In doing so, institutions were required to be able to demonstrate and to provide documentation indicating compliance with all applicable government requirements and regulations. This freedom applied to all learning activities that did not follow traditional credit hour tracking. Such was the case for competency-based programs or direct assessment programs: "An institution must establish a methodology to reasonably equate…its claim that the program or portion of the program is equivalent to specific number of credit or clock hours" (Middle States Commission on Higher Education, 2009e, p. 6).This was similar to text found in another document that MSCHE used when reviewing member institutions' academic offerings for "appropriate academic content, breadth, length, and rigor" (Middle States Commission on Higher Education, 2009a, p. 4). The same document reiterated that institutions were permitted to use alternative ways of measuring and tracking learning as long as an institution cold demonstrate compliance to all governmental policies and regulations, and that "academic content, breadth, length, and rigor" (p. 4) were present for each course and program. Within another document the same text was used as noted above when discussing credit hour values (Middle States Commission on Higher Education, 2009f).

Responsibility

When institutions were accredited by MSCHE, they became part of a self-regulated community, with each member agreeing to uphold the standards of accreditation. MSCHE defined regional ideals in *Designs for Excellence: Handbook for Institutional Self-Study* (Middle States Commission on Higher Education, 2002a): "Standards reflect indicators of quality that are appropriate for institutions of higher

education and are the basis for judging institutional effectiveness….Middle States accreditation is an expression of confidence in an institution's mission and goals, its performance, and its resources" (p. 3). An institution was obligated to demonstrate to peer institutions within the MSCHE higher education community that the institution met or exceeded mutually agreed standards of the association (Middle States Commission on Higher Education, 2009b). Thus, MSCHE held institutions responsible for credit hour definition, assignment, and translation of credit hours for assorted learning formats. MSCHE emphasized its commitment to education with focused standards ensuring quality education (Middle States Commission on Higher Education, 2009c, 2011a). Evaluation of institutions occurred regularly through self-study evaluations, peer reviews, and substantive change requests. Reviews happened five years after initial accreditation, and subsequently, every ten years (Middle States Commission on Higher Education, 2002a, 2009e). As noted previously, MSCHE reviewed the programs and courses of member institutions for "academic content, breadth, length, and rigor" (Middle States Commission on Higher Education, 2009a, p. 4). As part of the review MSCHE evaluated institutions' assignment of credit hours for content, breadth, length, and rigor for appropriateness to course level and degree. An institution's policies for transferring credit hours were also assessed. Transfer policies was needed in an institution's published catalog. The information had to contain criteria that were used when evaluating other institutions' credit hours (Middle States Commission on Higher Education, 2009b, 2009c, 2011b).

During an institution's self-study and review, and during peer review assessments, verifiable evidence was sought on how institutions met accreditation standards (Middle

States Commission on Higher Education, 2002a). Under MSCHE's "Standard 7: Institutional Assessment," evidence sought after was to ensure "that institutional processes and resources support appropriate learning and other outcomes for its students and graduates" (Middle States Commission on Higher Education, 2002a, p. 34). "Standard 11: Educational Offerings" was more focused on student learning and outcomes. The standard read: "The institution's educational offerings display academic content, rigor and coherence that are appropriate to its higher education mission. The institution identifies student learning goals and objectives, including knowledge and skills for its educational offerings" (Middle States Commission on Higher Education, 2002a, p. 39). Further emphasized in "Standard 12: General Education," curricula were reviewed to evaluate the knowledge and skills students acquire are level appropriate for college course work, program, and degree.

Activities related to learning were considered in part by "Standard 13: Related Educational Activities" for appropriateness to higher education. It was this standard that addressed distance learning. All education modalities were directed to be "comparable to those offered in more traditional formats within higher education" (Middle States Commission on Higher Education, 2002a, p. 44). Other documents indicated that an institution was responsible for ensuring that the same standards of traditional learning were applied to distance learning (Middle States Commission on Higher Education, 2009c, 2011a, 2011b). Evaluating student learning was governed by "Standard 14: Assessment of Student Learning." This standard required that appropriate higher education knowledge, abilities, and competencies were assessed; ensuring graduating

students achieved higher education learning (Middle States Commission on Higher Education, 2002a, 2011a).

Translation Policy

The MSCHE defined the credit hour similarly to the traditional credit hour definitions noted in other sections of this chapter. In *Guidelines: Degrees and Credits* (Middle States Commission on Higher Education, 2009e) a more substantial definition appeared in commission documentation. Table 4.3 and Appendix P provided a breakout of class time, student time, and any extra time needed for experiential learning. These tables indicated the traditional one instructional hour plus two student preparation hours credit hour base. Although *Guidelines: Degrees and Credits* defined a credit hour and provided parameters for many learning activities, asynchronous online learning or any other distance education formats were not discussed in the document.

The MSCHE's "Standard 13: Related Educational Activities" addressed credit hour assignment for nontraditional learning modalities. As noted, the standard obligated the institution to make certain that all educational formats were comparable to a traditional format such as classroom settings (Middle States Commission on Higher Education, 2002a). Other documents found indicated that institutions were responsible for online education as if online course work was the same as an on campus classroom. This included support, logistics, and other factors that were involved in providing online education. Reviews were conducted on distance education in similar fashion to traditional programming (Middle States Commission on Higher Education, 2002a, 2009c). Within two newsletters (Middle States Commission on Higher Education, 2009a, 2009f) distance education was discussed. Found were references to "Standards 7, 13, and 14;" these were

discussed previously. As indicated, institutions were responsible for their online education courses as if they were on campus classes.

Two MSCHE documents specifically addressed distance education: (a) *Distance Learning Programs: Interregional Guidelines for Electronically Offered Degree and Certificate Programs* (Middle States Commission on Higher Education, 2002b) and (b) *Distance Education Programs: Interregional Guidelines For The Evaluation Of Distance Education (Online Learning)* (Middle States Commission on Higher Education, 2011a). These documents presented "Hallmarks of Quality" for the region's institutions. The "Hallmarks" covered topics such as (a) institutional mission and online education; (b) institutional plans for developing, sustaining, supporting, and expanding; (c) governance of online education; and (d) services, support, integrity, faculty, and assessments. "Hallmark 4" (Middle States Commission on Higher Education, 2011a) was about the issue of course and program content and rigor. The hallmark explained that online education was comparable "to programs offered in traditional instructional formats" (p. 9). No policy or practice specifically addressing translation of asynchronous online education activities to credit hour values was found.

MSCHE Summary

The MSCHE defined the credit hour in a fashion similar to the traditional credit hour and the region also considered other experiential types of learning such as laboratory and independent study in the same custom as commonly practiced in higher education. Although the MSCHE had documentation addressing online education, there was a lack of guidelines, practices, or policies that did not provide for the specific translation of asynchronous online education activity into credit hour values. Instead, the

guidance provided was that online education was required comparable to traditional education. Found in the region's accreditation standards and other data were expectations of institutions to have documentable evidence in how determination was made for online education credit hour values.

Commission on Institutions of Higher Education

The Commission on Institutions of Higher Education (CIHE) was within the New England Association of Schools and Colleges (NEASC). Founded in 1885, the NEASC was the oldest accrediting body within the United States. The region included five states: Connecticut, Maine, Massachusetts, New Hampshire, and Vermont. The NEASC also accredited more than 60 American international schools worldwide (New England Assocation of Schools and Colleges, 2011).

Credit Hour Definition

The CIHE stated that the credit hour system was originally invented in New England for students' selection of courses and for academic measure of "engaged learning time expected of a typical student enrolled not only in traditional classroom settings but also laboratories, studios, internships and other experiential learning, and most recently distance learning" (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005, p. 1). P21 referred to the region's documentation when defining a credit hour. P21 indicated that the region recently updated its statement on credits to more closely match the recent changes of DOE. The document referred to was *Policy on Credits and Degrees* (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2011a). P21 did not consider that there was any significant change from the prior version of *Statement on*

Credits and Degrees (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005); as explained, primarily, language was updated to correlate terminology with the DOE documentation. P21 denoted that credit hour use was originally developed for traditional classroom settings. P21 also suggested that with contemporary learning activities the credit hour did not neatly serve the need of tracking learning.

Academic credit was used as a currency that other institutions and persons may consider as recognition of students' academic work. Although credit hours were commonly used within U.S. education, credit values varied from one institution to another. Academies may be innovative in education, permitting new learning models and course offerings (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005). However,

> Institutions whose policies, practices, or resources differ significantly from those described in the Standards for Accreditation must present evidence that these are appropriate to higher education, consistent with institutional mission and purposes, and effective in meeting the intent of the Commission's Standards. (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005, p. 1)

The CIHE (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005, 2011a, 2011b) expected its institutions to be consistent with commonly held higher education practices within the standards of the association: "The institution's degrees and other forms of academic recognition are appropriately named, following practices common to American higher education in terms

of both length and content of programs" (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005, p. 1). CIHE documents further indicated the credit hour system was part of the national academic landscape and the basis for academic tracking and degrees.

Although common practices maintain similarity, variance was also found in CIHE's direct definition of credit hour:

> A quantification of student academic learning based on the amount of time a typical student spends engaged in academic study. One semester unit represents how much time a typical student is expected to devote to learning in one week of full time undergraduate study (at least 40-45 hours including, for example, class time and preparation or time engaged in asynchronous on-line learning). Thus a six-week summer session might, if full time, equate to six units. An alternative norm is one unit for three hours of student work per week (e.g., one hour of lecture and two of study or three of laboratory) for ten weeks per quarter or 15 weeks per semester. Some institutions require more student time per credit for certain forms of experiential learning. A full-time undergraduate student program should normally be 14 to 16 units, and, if fulltime, no less than 12 units. More time is expected to be devoted to study at the graduate level, typically more than three hours of study for every hour in class. A full-time graduate program is normally nine units or less. Considerable excess allowed on grounds of student ability or innovative means of instruction is subject to special analysis and approval. (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005, p. 2)

The learning time for the CIHE's "typical student" is shown in Table 4.4 (see Appendix Q for a more detailed display).

Responsibility

The CIHE introduced accreditation as a "uniquely American activity" (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2009a, p. 3). A description explained that accreditation was purely voluntary and operates on self-evaluation and peer review. With accreditation, quality assurance of institutions was provided as well as encouragement and expectation to continually improve in providing higher education. Accreditation was granted only to programs and institutions that met or exceed stated criteria. The CIHE (2009a) further indicated that although accreditation ensured quality education, "institutional or programmatic accreditation cannot guarantee the quality of individual graduates or of individual courses within an institution or program, but can give reasonable assurance of the content and quality of the education offered" (p. 3). However, stated further in the document, accreditation "is not a regularizing force, measuring every institution by a uniform set of quantitative standards" (p. 4). Instead, agreed upon standards were held as benchmarks for each institution and program. Institutions and programs provided documentation that demonstrated standards were met, and that policies and practices were in place to ensure compliance. Through documentable evidence, the CIHE held its membership accountable by use of eleven standards for meeting educational goals and for providing quality education (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2009a, 2011b).

Table 4.4

CIHE Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Typical student 1 credit	Combination to equate to 3 hrs			Combination to equate to 45 hrs			45 hrs
Typical student course 3 credits	Combination to equate to 9 hrs			Combination to equate to 135 hrs			135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Experiential types of learning may include practice, independent study, studio, and internship. Source is New England Association of Schools and Colleges Commission on Institutions of Higher Education. (2005). *Statement on Credits and Degrees*. Bedford, MA: New England Association of Schools and Colleges Commission on Institutions of Higher Education. Retrieved April 17, 2010 from http://cihe.neasc.org/downloads/POLICIES/Pp110_StatementonCreditsandDegrees.pdf.

An assessment of student learning is present in most of the individual standards. As such, the CIHE indicated concern with appropriate content, learning outcomes, varied assessment methods, and qualified faculty for subject and teaching (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2009a).

"Standard 4: The Academic Program" was most directly related to course work, and explained the commissions expectations:

> The institution's academic programs are consistent with and serve to fulfill its mission and purposes. The institution works systematically and effectively to plan, provide, oversee, evaluate, improve, and ensure the academic quality and integrity of its academic programs and the credits and degrees awarded. The institution sets a standard of student achievement appropriate to the degree awarded and develops the systematic means to understand how and what students are learning and to use the evidence obtained to improve the academic program. (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2011b, p. 7)

The CIHE used "Standard 4" as a guide when assessing institutions for understanding student learning and meeting educational needs relative to subject, course, program, and academic level (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2010).

When students moved from one institution to another, the receiving institution assessed the incoming number of credit hours for acceptance (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2009c).

Foundational to transferring credit hours was built on "the principle that each institution is responsible for determining its own policies and practices with regard to the transfer and award of credit" (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2004, p. 1). Criteria for transferring credits were required to be posted for students and the public in catalogs, on websites, and other relevant institutional publications (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2004, 2009c). An institution's review and acceptance of credit hours was based on several "academic factors that can be involved in transfer of credit decisions (e.g., existing course equivalencies, articulation agreements, grades, comparability, course level and content, course applicability toward a major or degree, and course or program prerequisites)" (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2004, pp. 1-2). Additionally, institutions must judge credit hours from other institutions with three criteria:

> A) the educational quality of the institution from which the student transfers; B) the comparability of the nature, content, and level of credit earned so that offered by the receiving institution; and C) the appropriateness and applicability of the credit earned to the programs offered by the receiving institution, in light of the student's educational goals. (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2004, p. 2)

Although the accreditation process provided quality assurance of institutions, the CIHE (2004) reiterated a prior point in another document by emphasizing that credit hour review must compare "nature, content, and level of transfer credit and the appropriateness

and applicability of the credit earned" (p. 3) to receiving an institution's courses, programs, and judgment.

The CIHE (2004) indicated that although accreditation ensured quality, a receiving institution must also "give careful attention to the accreditation conferred by accrediting bodies" (p. 2). Both the U.S. Department of Education and Council for Higher Education Accreditation had standards and processes in place that must be met before an accrediting organization was recognized. These organizations placed high value on the accrediting system. There were regional accrediting organizations, which historically, were the bodies providing primary accreditation. National and professional agencies granted specialized accreditation to institutions or professional programs based on field (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2004).

Translation Policy

The CIHE's revised its *Statement on Credits and Degrees* (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005) to reflect changes brought on by *Program Integrity Issues: Final Rule* (2010c). The updated version, *Policy on Credits and Degrees* (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2011a) indicated that it was "obliged to follow federal law and regulations" (p. 1) and proceeded to provide reiteration of the DOE credit hour definition (see earlier sections). Also, "at the time of the [institution's next] Comprehensive Evaluation, the Commission will review the institution's policies and procedures for determining the credit hours that the institution awards for courses and programs and how those policies and procedures are applied to

the institution's programs and coursework" (p. 2). At that time the CIHE will make a determination based on documented evidence if an "institution's assignment of credit hours conforms to commonly accepted practice in higher education" (p. 2).

When defining a credit hour, *Statement on Credits and Degrees* (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2005) specifically indicated that a typical undergraduate student should be involved in learning for a minimum of 40 hours each week that included "class time and preparation or time engaged in asynchronous on-line learning" (p. 2). *Guidelines for the Evaluation of Distance Education* (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2009b) indicated that institutions were responsible for rigor and quality of course offerings appropriate for educational norms.

By referencing documents, *Policy on Credits and Degrees* (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2011a) and *Guidelines For The Evaluation of Distance Education (On-Line Learning)* (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2009b), P21 emphasized that institutions were expected to define and operate "based on common institutional practice in [the region] and are consistent with practices of regionally accredited institutions elsewhere in the United States." P21 discussed that the credit hour was the time a typical student would spend in class and in class preparation each week. This time was described as 40-45 hours of learning a week per credit hour. P21 noted that for distance education, students should be engaged in learning activities similar to the traditional standards of 40-45 hours each week per credit hour.

P21 noted that institutions were held responsible through policies and guidelines. It was peer reviewers' evaluations of institutions that determined how well schools were doing in regards to standards. The time students take for learning each week was expected to be 45 hours per credit regardless of the format—face-to-face or nontraditional. P21's commission reviewed institutions to see if they had policies and practices "based on common institutional practice in [the region] and are consistent with practices of regionally accredited institutions elsewhere in the United States."

Guidelines for the Evaluation of Distance Education (On-line Learning) (New England Association of Schools and Colleges Commission on Institutions of Higher Education, 2009b) expected institutions to use these guidelines along with Commission's standards and policies. Institutions were asked to include evidence on how each of the nine hallmarks was met. These were similar to guidelines of Middle States Commission on Higher Education, *Guidelines: Degrees and Credits* (Middle States Commission on Higher Education, 2009e), previously discussed. The CIHE guidelines covered institutional mission and plans as related to online education, and how the institution would sustain, support, and govern. There were guidelines that specifically addressed integrity, faculty, and assessments. The fourth guideline addressed course content and curricula, which indicated an institution's online educational offerings, were expected to match rigor and standards of traditional forms of learning.

CIHE Summary

In the traditional fashion, the CIHE defined a credit hour with the standard one instruction hour plus two student preparation hours expectation for learning. However, the regional definition did not divide the learning time in the one-two divisions. Instead,

for a “typical” student some “combination” of class, preparation, and extra time were equated to the three hours found in earlier definitions. The expected result was the same resulting in 45 hours per week per credit for a semester. However, the CIHE did explain that institutions might require more than the typical time for experiential learning such as laboratory courses. Also, in variance to other regions, the CIHE indicated that graduate level course work involves more time per credit hour. Thus, a student should be involved in 60+ hours per week per semester for one credit hour.

The policies and procedures found were not specific in addressing asynchronous online education class “time” for credit hour calculations. The expectations for online education were based on the traditional classroom. Similar to the DOE, the CIHE allowed institutions freedom to conduct online education, as they deemed appropriate. The data indicated that institutions must present documentation that justified its credit hour values relational to customary higher education norms and practices. No data were found to indicate a specific translation for online learning into credit hours.

The Higher Learning Commission

In March of 1895, several schools, colleges, and universities within the Midwest met to organize the regional accrediting agency now known as the North Central Association of Colleges and Schools (NCACS). The object was to establish relationships between secondary schools and higher education, and to develop articulation protocols between the two institution types. Establishing a working relationship between scholastic levels required an extensive review and examination of secondary schools. Shortly following, examination of higher education institutions began. Members represented nineteen states, American Dependents’ Schools overseas, as well as in U.S. tribal nations’

schools and colleges within the nineteen states. Two commissions existed within NCACS: Commission on Accreditation and School Improvement (CASI) and The Higher Learning Commission (HLC). These two bodies were responsible for accrediting schools under their jurisdiction (North Central Association of Colleges and Schools, 2011; North Central Association of Colleges and Schools--The Higher Learning Commission, 2003).

HLC was charged with oversight of higher education institutions within the region. As such, HLC governed its member institutions and accreditation by relying

> On a cadre of carefully selected and trained professionals who serve the Commission in its accreditation processes…These volunteers [Peer Review Corps] share their knowledge of and direct experience with higher education, their dedication to educational excellence, and their commitment to the principles underlying voluntary accreditation. (North Central Association of Colleges and Schools--Higher Learning Commission, 2011a, p. ¶11)

As with the other regional agencies, self-evaluation and peer review were used to ensure quality education as agreed on by the accreditation standards.

Credit Hour Definition

HLC (2003) indicated that regardless of the learning format, the credit hour was used as a mechanism to quantify learning and track students' course work. Further, the HLC stated within its *Handbook of Accreditation*,

> The traditional Carnegie formula based heavily on the amount of seat time associated with a purported learning experience does not address current learning situations. How much students study inside or outside of formal classes, expectations associated with the course, student preparation, cogency of the

> learning experience, and pedagogical methods all contribute to the significance of a learning experience. Therefore, the Commission does not expect every institution to follow the traditional Carnegie formula, but it does require institutions that base their credit hour assignments on other factors to have policies that explain and justify how they consistently reach sound decisions about how to recognize college learning. (North Central Association of Colleges and Schools--The Higher Learning Commission, 2003, p. 3.2-9)

Several pages after this definition, HLC further explained credit hour application and use for course work. HLC expected an:

> Institution to be able to equate its learning experiences with semester or quarter credit hours using practices common to institutions of higher education, to justify the lengths of its programs in comparison to similar programs found in accredited institutions of higher education, and to justify any program-specific tuition in terms of program costs, program length, and program objectives. (North Central Association of Colleges and Schools--The Higher Learning Commission, 2003, p. 8.2 - 1)

If an institution did not use credit hours, the institution must provide an explanation of how it assigns credit hour equivalencies. HLC indicated that its policies addressed its memberships' ability to "provide semester or quarter credit hour equivalencies for transcripted courses; justify the total number of credit hours in accordance with credit hour expectations for similar programs in other accredited institutions; [and] justify any program-specific tuition" (North Central Association of Colleges and Schools--The Higher Learning Commission, 2003, p. 8.2 - 1).

In other documentation, the HLC reiterated its policy and associated credit hours and program length to required Federal regulations. Again, an institution must be able to demonstrate that its application and use of credit hours were "within the range of good practice currently in higher education in the United States" (North Central Association of Colleges and Schools--The Higher Learning Commission, 2009, p. 1). When prescribing how to assess prior learning for credit hours, the HLC indicated that institutional information and guidelines for translating prior learning into credit hours, that the learners' knowledge and academic level must be demonstrated and that subject matter faculty would be involved in the process (North Central Association of Colleges and Schools--The Higher Learning Commission, n.d.-b).

Unlike other accrediting commissions discussed, the HLC documentation did not provide guidelines or formulae for translating learning activities into credit hours or detailing expectations for calculating credit hours. Thus, no figure will be presented for HLC data.

Responsibility

As noted previously, the HLC expected its membership to meet and maintain regionally agreed on standards. HLC required an:

> Institution to be able to equate its learning experiences with semester or quarter credit hours using practices common to institutions of higher education, to justify the lengths of its programs in comparison to similar programs found in accredited institutions of higher education, and to justify any program-specific tuition in terms of program costs, program length, and program objectives. (North Central

> Association of Colleges and Schools--The Higher Learning Commission, 2003, p. 8.2 - 1)

Such institutional justification pertained to assessing credit hours for prior learning and transfer of credit. The HLC allowed each institution to determine its own policies and procedures for assigning credit hour values and for acceptance of transfer credit hours (North Central Association of Colleges and Schools--The Higher Learning Commission, 2000, 2003, n.d.-b).

The HLC indicated that its member schools must "notify the Commission about a distance education offering and when it needs to seek approval of that distance education offering" (North Central Association of Colleges and Schools--The Higher Learning Commission, 2010, p. 1). The Commission issued approval as appropriate. In *Best Practices for Electronically Offered Degree and Certificate Programs* (North Central Association of Colleges and Schools--The Higher Learning Commission, n.d.-a) The HLC discussed how learning methods and tools may change and that there are different learning needs. However, the commission believed quality endured through pedagogy and curriculum. Therefore, institutions should be able to demonstrate sound and reasonable practices for all aspects in providing distance education. It was the institution's responsibility to guarantee its online education met acceptable practice within higher education (North Central Association of Colleges and Schools--The Higher Learning Commission, n.d.-a).

In 2009, the Office of Inspector General within United States Department of Education (OIG) issued an *Alert Memorandum* (Scott, 2009a) to HLC concerning a member institution. OIG found that despite issues discovered during a comprehensive

review, HLC granted "full initial accreditation with no limitations on programs it [the institution] offered at the time of initial accreditation" (p. 1). Thus, OIG argued that HLC was not acting in the best interest of quality education for students, and "calls into question whether the accrediting decisions made by HLC should be relied upon by the Department of Education" (p. 1). Thus, HLC's responsibility and review for assuring quality higher education was called into question.

> OIG specifically raised issue and suggested that
>
> 1) HLC does not have specific standards related to program length and credit hours, or 2) HLC has specific standards related to program length and credit hours, but (a) does not follow them or take effective action when faced with evidence of non-compliance or (b) the standards are low enough or lacking in specificity. (p. 7)

OIC also suggested that the DOE should call into question the quality of education provided in HLC accredited institutions.

Subsequent to OIG's memorandum, Manning (2009), President of Higher Learning Commission, sent a letter to HLC colleagues discussing the *Alert Memorandum* (Scott, 2009a). The letter indicated that OIG's visit and review focused on credit hours and program length. Manning explained that the memo "reflects a difference in academic judgment between the OIG review team and the Commission's peer reviewers on a single matter at a single institution" (p. 1). She further indicated that the Commission was confident that it made the correct accreditation decision concerning that specific institution because a peer review team using the prescribed regulations and standards

made the decision. Manning reiterated the thought that OIG's decision was a difference of judgment concerning curriculum and academic practice (Manning, 2009).

Representing HLC before a Senate Committee on Health, Education, Labor and Pensions, Manning (2011b) presented information concerning higher education and accreditation. Manning presented a brief synopsis of U.S. education accreditation, the seriousness HLC took as its responsibility for accreditation, and discussion on changes the HLC made and would make in response to a transformation occurring in education. The HLC changes were implemented to address issues that affected educational quality. One such change applied more strict standards so initial accreditation became more difficult to receive and provided greater scrutiny for substantive change requests; both of the decisions directly impacted credit hour assignment.

As supplement to Manning's testimony before the Senate Committee, HLC issued *Higher Learning Commission Statement to the U.S. Senate Committee on Health, Education, Labor and Pension* (North Central Association of Colleges and Schools--Higher Learning Commission, 2011c). This statement contained two points of interest in the discussion of credit hours: 1) self-regulation, and 2) role and oversight of accreditation. These points provided an explanation of what was involved with the two topics, and that ultimately the DOE managed accreditation agencies through its recognition process. With the established system U.S. accreditation was equipped to provide proper oversight of educational institutions and to hold institutions accountable for decisions and actions related to credit hour values.

With the release of *Federal Compliance Program: 2009-2010,* the HLC reiterated the policy required all institutions to demonstrate that the credit hour allotments and use,

were "within the range of good practice currently in higher education in the United States" (p. 1). Furthermore, any substantive change or request for new program had to receive approval from HLC. This document updated HLC's *Handbook of Accreditation, 3rd Edition*, "Section 8.2: The Commissions Federal Compliance Program" (2003). With two other documents released by the HLC, *Dear Colleagues Letter* (Manning, 2011a) and *Commission Launches Criteria Revision Initiative: Welcomes Participation in Shaping the Outcome* (North Central Association of Colleges and Schools--Higher Learning Commission, 2011b), the commission requested membership input on DOE's *Program Integrity Issues: Final Rule* (20112010c) and *Dear Colleague Letter* (Ochoa, 2011).

In *Dear Colleagues Letter,* Manning (2011a) updated membership on the DOE's policy and explained that the region would begin to establish policy and procedures in regards to the new regulations.

> Institutions and accrediting agencies are responsible for properly implementing the credit hour regulatory requirements…For the 2011-2012 award year, as long as an institution or accrediting agency is in the process of complying with these provisions, we will consider the institution or accrediting agency to be making a good-faith effort to comply, and Department staff will take this effort into consideration when reviewing an institution's or accrediting agency's implementation of the regulations. (Manning, 2011a, p. 1)

This specific point indicated to institutions that there was time allotted to plan and make change.

The second document, *Commission Launches Criteria Revision Initiative: Welcomes Participation in Shaping the Outcome* (North Central Association of Colleges

and Schools--Higher Learning Commission, 2011b), presented proposed changes to HLC's Accreditation Handbook. A suggested change related to the credit hour was "Criterion Five: Substance and Rigor" (p. 5). The proposed new criterion stated, "The institution offers programs of substance, rigor, and relevance appropriate to its mission and to higher education" (p. 5). The new statement also recommended that core competencies include that an institution must (a) demonstrate its commitment to learning, (b) make certain that its programs were of higher education caliber and proper academic level proper, (c) assess and demonstrate learners gained knowledge and skill appropriate to academic level, (d) evaluate its programs for relevance, application, and quality, and (e) provide for all institution persons gain and use knowledge appropriately.

Translation Policy

HLC did not directly define a credit hour since seat time, which was associated with traditional credit hour meaning, and was often not congruent with current learning situations. During the interview, the point was made that there was more to learning than how much time a persons spends learning. The region does, however, "require institutions that base their credit hour assignments on other factors to have policies that explain and justify how they consistently reach sound decisions about how to recognize college learning" (North Central Association of Colleges and Schools--The Higher Learning Commission, 2003, p. 3.2 - 9). The decisions an institution made in valuing classes with credit hours had to be credible and the institution had to "justify the lengths of its programs in comparison to similar programs found in accredited institutions of higher education (North Central Association of Colleges and Schools--The Higher Learning Commission, 2003, p. 8.2 - 1). The point also made by P13 was that

accreditation standards address program length for institutions. However, should an institution use another unit other than credit hour that an institution had to "justify the use."

Institutional requirements were confirmed by P13's interview. P13 stated, "We are more interested in learning than in seat time." Further, P13 noted that research showed more time often equated to learning more. Therefore, as presented by P13, the credit hour was not a good tool to indicate learning. P13 mentioned several times during our conversation that learning should be the focus and was the "focus for the commission and region." P13 reiterated that the amount of time spent learning was not a good indicator of education. It is relied on institutional policies that ensured compliance with any Federal need for credit hours, but allowed institutions freedom to conduct education appropriate to mission and need. P13 indicated convenience of the credit hour use by referring to the *Handbook of Accreditation*, which indicated that the credit hour was an important tool institutions use to tracking learning allowing accumulation and transfer of credit hours.

As stated previously, each region held their institutions accountable for how credit hours were assigned and used. It was through self-evaluation reports and peer reviews that commissions used to assess institutional compliance to standards. The common phrase appeared to be "acceptable common practice" within higher education. P13 mentioned that the commission was considering adding a phrase to standards, "Programs, courses, everything an institution does, wherever or however delivered, had to meet the same standards." P13 indicated that what that exactly means and how to evaluate it was still being discussed. The challenge was "how to decide when a 3 credit course has

substance and rigor." Because P13's region did not define exactly what the credit hour was, but it relied on institutions to document and provide evidence of how credit hours were determined and applied. P13 stated,

> In our reviews, we're going to look for systems, instructions, and processes that assure us that the institution has sufficient oversight over the determination of credit hours…And, we're not in the position to force how long a class meets…So what we need to look at is what's the institution's system for both making decisions to how long a course should meet and enforcing that. And, we can review the process they have in place and occasionally when we get a complaint we can deal with a complaint.

P13 progressed on to discuss how various institutions ensured compliance and that institutions were "waiting for us [the commission] to tell them how we plan to do it [determine compliance]."

P13 indicated that the commission is not likely to supersede an institution if a faculty governance process is in place reviewing curriculum and programs. Noting a difference between institutions with faculty governance and institutions with no faculty governance, P13 stated,

> Traditionally, quality assurance in higher ed was done first at the institutional level by its own faculty. We didn't feel the necessity as accreditors to go in and second guess decisions that were made by intelligent faculty bodies after careful examination. I think what begins to worry us occasionally are institutions where we can't see the faculty review process internally working the way we're used to seeing it, and then we say, "Explain to us how this does work. Do you have a

> virtual faculty? Do they get together virtually and review the curriculum? Is it all decided by the director of marketing?" I think that's where a lot of the anxiety about certain new style institutions particularly institutions that are run by people who are new to the higher education world.

P13's statements are supported in *Best Practices for Electronically Offered Degree and Certificate Programs* (North Central Association of Colleges and Schools--The Higher Learning Commission, n.d.-a). In many ways this document was found to be comparable to the distance education hallmarks and guidelines discussed in prior sections. In "Curriculum and Instruction" section of the HLC's *Best Practices* document the focus on student learning and outcomes was crucial for online or electronically offered education. It was indicated that educational methods change, but that does not allow for any reduction in standards. Decisions concerning content, rigor, pedagogy, and all matters of learning must be "made by qualified professionals… [focusing] on learning outcomes" (p. 4).

P13 also discussed how some nontraditionally organized institutions did well since they did incorporate faculty, content experts, instructional designers and experts, and/or others who are familiar with higher education and the subject matter. An example provided by P13 was of systems that had standardized curriculum that was scalable, robust, and allowed for local instructors to customize for that particular setting. A benefit of this system discussed and described was that a

> System of curriculum development and review and evaluation to a point where an institution can say "why are these students in Texas not measuring with the same outcomes as our students in 17 other locations?" [Those] institutions can do a

> really robust job of digging into some of those details regardless of the fact that almost 90% of their faculty is adjunct.

P13 then emphasized that because there was so much variance between institutions the commission relied on learning outcomes. Since higher education was evolving, learning outcomes were key: "That's where our push really goes back to learning outcomes so that regardless of what type of faculty an institution has." P13 indicated how the commission changed over the years with expectations when evaluating institutions:

> We used to have an expectation for a general institutional requirement where you had a certain percentage of your faculty that were doctorally prepared, were full time, and things like that, and we shifted that over the years recognizing that just because they're all full time and been there 40-something years doesn't necessarily make them good faculty members anymore…the evidence is student learning.

Because the HLC did not tightly follow the traditional credit hour meaning, it was perceived by the DOE that the region might not be assuring proper quality education. In response to DOE's comments, the region saw the DOE's understanding as a difference of judgment, but that the self-study and peer review processes ensured quality education and federal compliance (Manning, 2009). However, in documentation found HLC committed to begin reviewing current policies and procedures followed by updating them in regards to DOE's change of credit hour definition and other regulations (Manning, 2011a). An example of a policy change was found in the proposed addition of "Criterion Five: Substance and Rigor" (North Central Association of Colleges and Schools--Higher Learning Commission, 2011b, p. 5) into the region's accreditation handbook.

Perhaps related to HLC's position of not defining the credit hour, no policy or procedure was found to translate online education into credit hour values. The responsibility is placed on institutions for policies and procedures, and to document how decisions and credit hour values are comparable with common higher education practices.

HLC Summary

Through its choice of not defining a credit hour and placing responsibility on its institutions for credit hour policies and procedures, HLC may or may not have been assuring that credit hour values were consistent with higher educational norms. As stated, learning outcomes and assessment provided evidence of learning, therefore, HLC placed its focus on how institutions were providing education and meeting rigorous and appropriate academic educational outcomes as evidenced by student assessment. Each institution was permitted to form its own standards as long as documentable evidence was available showing reasonable comparison to accepted higher education practices and norms.

Northwest Commission on Colleges and Universities

Northwest Commission on Colleges and Universities (NWCCU) was one of six regional accrediting agencies reviewed for this project. Its seven state region included Alaska, Idaho, Montana, Nevada, Oregon, Utah, and Washington, which covers the Northwestern area of U.S. (Northwest Commission on Colleges and Universities, 2010b). Responsibility of NWCCU was similar to the other regional agencies; i.e., "accrediting higher education institutions" (Northwest Commission on Colleges and Universities, 2010b, ¶1). In 2010 NWCCU received reaffirmation from Department of Education

(DOE) as an accrediting body recognized by the Department (Northwest Commission on Colleges and Universities, 2010b).

Credit Hour Definition

NWCCU defined the credit hour as following commonly accepted higher education practices and standards:

> A quantification of student academic learning. One unit represents what a typical student might be expected to learn in one week (40-45 hours including class time and preparation) of full-time study…An alternative norm is one unit for three hours of student work per week (e.g., one hour of lecture and two of study or three of laboratory) for ten weeks a quarter or 15 weeks a semester. (Northwest Commission on Colleges and Universities, 2010a, p. 6)

Academic credit was defined as "credit applicable toward a degree or credential at the institution awarding it…or acknowledging equivalency from learning experience adequately substantiated" (Northwest Commission on Colleges and Universities, 2010a, p. 1). Shown in Table 4.5 is the total learning time for one credit hour as defined by NCCU (see Appendix R for more detailed information).

Responsibility

The NWCCU's "Standard Two: Education Program and Its Effectiveness," *Accreditation Handbook* (2003) indicates that an institution has the responsibility of its credit hour values and use.

> The institution is able to equate its learning experiences with semester or quarter credit hours using practices common to institutions of higher education, to justify the lengths of its programs in comparison to similar programs found in regionally

Table 4.5

NWCCU Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Typical student 1 credit	Combination to equate to 3 hrs			Combination to equate to 45 hrs			40-45 hrs
Typical student course 3 credits	Combination to equate to 9 hrs			Combination to equate to 135 hrs			120-135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. Created from Northwest Commission on Colleges and Universities. (2003). *Accreditation Handbook* (2003 ed.). Redmond, WA: Northwest Commission on Colleges and Universities, and Northwest Commission on Colleges and Universities. (2010). *Glossary*. Retrieved April 19, 2010, from http://www.nwccu.org/Glossary%20and%20FAQs/ Glossary/Glossary.htm.

> accredited institutions of higher education, and to justify any program-specific tuition in terms of program costs, program length, and program objectives. (Northwest Commission on Colleges and Universities, 2003, p. 28)

"Section Two" also iterated that distance education courses, regardless of modality, must maintain the same academic standards as traditionally offered courses. Thus, a member institution had to demonstrate its credit hour values and use when applied to distance education, and that the choices of the institution ensured "both the rigor of programs and the quality of instruction" (Northwest Commission on Colleges and Universities, 2003, p. 45). Additionally, decisions that were made were appropriate for course and academic level, in order to ensure "the integrity of student work and the credibility of the degrees and credits it awards" (Northwest Commission on Colleges and Universities, 2003, p. 47).

Translation Policies

NWCCU defined a credit hour as "40-45 hours [a week] including class time and preparation" (Northwest Commission on Colleges and Universities, 2010a, p. 6). Documentation indicated an "alternative norm" as one credit equating to three hours of student work. The NWCCU also described a credit hour as learning that was sufficiently verified and that accumulated toward a degree.

The accrediting agency also made its policy for institutions to demonstrate its determination of credit hours and that the institution's credit hour values were like common higher education practices and credit hours. The NWCCU addressed distance education by indicating that any nontraditional course met the same academic standards as any traditionally offered course. This included quality, rigor, and substance as

appropriate to academic level (Northwest Commission on Colleges and Universities, 2003). It was not found that the commission provided any guidance, policy, or procedure for translation of online education into credit hour values.

NWCCU Summary

As found with other agencies discussed, NWCCU provided a credit hour definition. However, the definition did not specifically address asynchronous online education except that it must meet the same standards as traditional education. Common with other commissions, terminologies included in the credit hour definition were rigor, quality, substance, appropriate to academic level, and comparable to common higher education practice. The NWCCU data did not indicate any specific policies or procedures addressing asynchronous online education translation into credit hour values.

Commission on Colleges

The Commission on Colleges (COC) was part of the regional accrediting body, Southern Association of Colleges and Schools. COC was responsible for degree-granting higher education colleges and universities. COC jurisdiction included schools in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Virginia, and Latin America (Southern Association of Colleges and Schools Commission on Colleges, 2009, 2011b). The Southern Association of Colleges and Schools was originally founded in 1895. COC was organized in 1912 with the purpose of developing standards and processes in order to accredit higher education institutions (Southern Association of Colleges and Schools Commission on Colleges, 2009, 2011c).

Credit Hour Definition

A direct definition of credit hour was not found within the documents search. During the electronic question and answer exchange, P 15 was asked about credit hour definition. The response provided by P15 stated that the "Carnegie Unit is the beginning point." It was from that beginning that P15 referenced "Comprehensive Standard 3.4.6" COC did have within its *Principles of Accreditation: Foundations for Quality Enhancement* (Southern Association of Colleges and Schools Commission on Colleges, 2009) principles or standards for institutions. Member institutions were required to comply with these principles for award of accreditation. "Principle 3.4.6" stated, "The institution employs sound and acceptable practices for determining the amount and level of credit awarded for courses, regardless of format or mode of delivery" (p. 26). In "Principle 3.4" institutions were instructed to provide documentation for determining credit hour values for nontraditional learning and for evaluating transferred credits for acceptance. Faculty at each institution determined content of courses and programs. "Principles 2.7 and 4.4" advised that course and program length should meet acceptable higher education practices.

Found in another document, COC reiterated that institutions must justify program length and credit hour values assigned as acceptable to higher education practice (Southern Association of Colleges and Schools Commission on Colleges, 2011a). The COC issued a policy statement: *Core Requirement 2.7.4: Documenting an Alternative Approach* (Southern Association of Colleges and Schools Commission on Colleges, 2007). Herein the COC indicated that institutions were responsible for credits earned through inter-collegiate agreements and for any other methods used that are not

considered traditional. In *Distance and Correspondence Education* (Southern Association of Colleges and Schools Commission on Colleges, 2010), courses and programs must be of appropriate length and quality as a traditional on-campus class. More specifically, "the institution employs sound and acceptable practices for determining the amount and level of credit awarded and justifies the use of a unit other than semester credit hours by explaining it [*sic*] equivalency" (p. 2).

On November 24, 2009, Wanda A. Scott, Assistant Inspector General, United States Department of Education, sent a letter to COC indicating the Office of Inspector General's results from a review of COC's standards for program length. The stated objectives of the review were to determine:

> (1) what guidance SACS [as related to COC] provides to institutions regarding program length and credit hours, (2) what guidance SACS [as related to COC] provides to peer reviewers to assess program length and credit hours when evaluating institutions, and (3) what documentation SACS [as related to COC] maintains to demonstrate how it evaluates institutions' program length and credit hours. (Scott, 2009c, p. 1)

The letter incorporated findings from another report from the Office of Inspector General, entitled *Southern Association of Colleges and Schools, Commission on Colleges' Accreditation Standards for Student Achievement and Program Length* (Pilottie, 2003). Information from the two documents indicated that the COC did have guidelines for program length. Institutions must demonstrate and document compliance to standards. In the latter document, Scott (2009c) stated the agency provided guidance to institutions for minimal program length. Peer reviewers were provided additional guidance and questions

for assessing program length and institutional compliance. Regarding the credit hour, the memorandum indicated that the COC provided general guidance for institutions in "Comprehensive Standard 3.4.6" within *The Principles of Accreditation: Foundations for Quality Enhancement*, *(Southern Association of Colleges and Schools Commission on Colleges, 2008)*, "The institution employed sound and acceptable practices for determining the amount and level of credit awarded for courses, regardless of format or mode of delivery" (p. 26). Similar statements were noted in Pilottie's (2003) memorandum. The COC also provided guidance for institutions and peer reviewers in *Resource Manual for the Principle of Accreditation: Foundations for Quality Enhancement* (Southern Association of Colleges and Schools Commission on Colleges, 2005). Scott (2009c) included text from the manual that read:

> 1) how the institution ensures the equivalency of credits awarded for alternative format courses, 2) what policies the institution has to determine the level and amount awarded, and 3) how the institution uses standards or professional organizations or practices of peer institutions in developing its credit awarding policies. The Resource Manual also provides general descriptions of documentation that could be used to support compliance with this standard including a course catalog identifying the credits assigned to courses and modes of instruction and any policies, guidelines, or written procedures for establishing and evaluating the award of credit. (Scott, 2009c, p. 4)

However, several sections in the memorandum mentioned that the COC had not defined clearly what established a credit hour. Also, COC did not provide specifics for institutions as to what were sound and acceptable practices when determining credit hour

value. Therefore, stated by Scott (2009c) more than once, "SACS [as related to COC] cannot ensure that its standard is being consistently applied" (pp. 1, 3). COC was credited, though, for showing that it can identify what was considered unacceptable when an institution's program addition request is denied.

Unlike agencies discussed previously, the COC documentation did not provide guidelines or formulae for translating learning activities into credit hours. Thus, no table will be presented for COC.

Responsibility

The COC responded to Scott's (2009c) memorandum draft. In their comments, the COC indicated there was indication that the traditional seat time definition of credit hours could not be used in assigning credit hour values since there were many methods of instruction that were no longer classroom based, including distance education. It was suggested that expectations existed for accrediting agencies to develop, adopt, and apply a credit hour definition that considers all forms of learning. Further, the practice of transferring credit between institutions was counter-productive, with each institution having its own values and expectations. Thus, "given the variety of experiences that would allow for such credit, it has been, and will continue to be, impossible to define for all institutions what constitutes a credit hour as applied to those credit assignments" (Wheelan, 2009, p. 2).

Wheelan's (2009) response mentioned that distance learning could not be measured by credit hour or seat time. However,

> There is an expectation that accrediting bodies adopt and apply a definition of what constitutes a credit hour so that it can be applied across the board to all

> learning experiences…. The traditionally accepted definitions of semester credit hours and quarter credit hours based almost exclusively on seat time can no longer be applied to half of the credits now being awarded by our higher education institutions. (p. 2)

Regardless of modality, the COC, through trained peer evaluators or reviewers, held "institutions accountable for the academic quality of ***any and all*** [emphasis in original] course work or credit recorded on an institution's transcript" (p. 2). By the professional judgment of the review team members, the COC assessed that an institution's "course work and learning outcomes are at the collegiate level and that all degree programs offered by the institution are comparable" (p. 2). Thus, COC believed its standards appropriate for institutional accreditation. P15 indicated that standards were there for institutions and standards provided the level needed for minimal attainment.

As discussed previously in this section, COC required institutions to be responsible for their credit hour values and use. Regardless of the learning delivery format, institutions had to be able to follow higher education common practices and demonstrate their decisions. This was previously discussed in "Principles of Accreditation 2.7, 3.4, and 4.4" (Southern Association of Colleges and Schools Commission on Colleges, 2009). Guidelines for documenting acceptable program length and credit hour values were provided by the COC in (a) *Handbook for Institutions Seeking Reaffirmation* (Southern Association of Colleges and Schools Commission on Colleges, 2011a), (b) "Core Requirement 2.7.4: Documenting An Alternative Approach" (Southern Association of Colleges and Schools Commission on Colleges, 2007), and (c) *Distance and Correspondence Education* (Southern Association of Colleges and Schools

Commission on Colleges, 2010) provided guidelines for institutions and instructions to provide documentable evidence that program length and credit hour values were acceptable within higher education practices.

Translation Policies

Data collected during this research found that the COC provided expectations for institutions. P15 elaborated that when reviews of institutions occurred, peer reviewers evaluated and judged if "the institution employs sound and acceptable practices for determining the amount and level of credit awarded for courses, regardless of format or mode of delivery." Specifically addressing online education, P15 stated that institutions had choices and were allowed to offer courses and programs as deemed appropriate. However, P15 continued, "institutions then have to justify the various requirements they have for asynchronous modalities to ensure that there is sufficient contact time with a qualified instructor, sufficient out-of-class preparation time, and sufficient time in dialogue with classmates."

The COC's document, *Distance and Correspondence Education* (Southern Association of Colleges and Schools Commission on Colleges, 2010), addressed the need for online education offerings to be of an appropriate length and similar quality as campus-based classes. The COC also evaluated each institution on how "the institution employs sound and acceptable practices for determining the amount and level of credit awarded and justifies the use of a unit other than semester credit hours by explaining it equivalency" (p. 2).

The COC had policies that guided program length and that required institutions to document and demonstrate compliance. Similarly to other regional agencies, COC had a

policy for institutions to have policies and procedures for determining credit hour values for courses regardless of modality. Institutions were instructed to demonstrate that their choices are acceptable within common higher education practices. However, no information was found specifically addressing translation of asynchronous online education into credit hour values.

COC Summary

The COC had expectations and standards of its membership similar to other regional accrediting agencies. Although not documented as such, it appeared that the Carnegie Unit, or the credit hour, was considered foundational in determining institutional compliance to standards and expectations. A lack of guidance was emphasized by documents issued by the DOE to the COC indicating absence of any such policies. As noted, institutions were required for policies concerning credit hour values. No COC policy was discovered concerning credit hours values for online education. The data appeared to indicate that the commission expected institutions to demonstrate beyond their policies how decisions and praxis were acceptable and comparable within the higher education community.

Accrediting Commission for Senior Colleges and Universities

The Accrediting Commission for Senior Colleges and Universities was within the Western Association of Schools and Colleges (WASCSenior). WASCSenior, its two sibling commissions, and its parent association were responsible for accreditation in California, Hawaii, Guam, and Pacific Basin (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010e, 2011). Formed in 1962, the association administered accreditation in the Western states of the

U.S. (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2011).

Credit Hour Definition

During the interview, P11 described how the region has had the same credit hour definition for some time. P11 referred to the region's handbook on accreditation and noted that a credit hour "is a commonly accepted quantification of academic learning." The standards, according to P11, further specified that typically 40-45 hours of student work included class and outside of class work each week. P11 also denoted that the region's definition was the "Carnegie Unit kind of definition." In reference to another regional document, P11 discussed that credit hour values and awards were mandated to be "consistent with institutional policies that reflect generally accepted norms or equivalencies in higher education." P11 further indicated that institutions were required to provide evidence of institutional "means for awarding credit," that definitions and practices were common to higher education, and that student achievement of stated learning outcomes were used in awarding credits. P11's credit hour discussion detailed how the credit hour use was originally developed for traditional classroom settings and that, with contemporary learning activities, the credit hour did not neatly serve need of tracking learning. However, P11 noted an important aspect of the region was focused on student learning and outcomes as crucial for determining credit hour values.

Regional documentation collaborated P11's interview discussion. In "Eligibility Criteria: Criterion 11" section of *How to Become Accredited: Procedures Manual for Eligibility, Candidacy, and Initial Accreditation* (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010b) indicated

that institutions were obligated to award "academic credits based on generally accepted practices in degree-granting institutions of higher education….[and that there were] institutional policies on award of credit" (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010b, p. 7). Institutions were also required to have policies that explained how domestic and international transfer credits were evaluated and used. These policies had to be consistent with WASCSenior policies (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010b).

The *Policies Manual* (2010c) of WASCSenior presented information concerning credit values and evaluation were presented. Institutions were expected to have documented policies addressing determination of credit hours for experiential learning, policies for evaluating and accepting transfer credits, and general credit hour use. WASCSenior followed the same practice found with other commissions. Institutions were expected to follow acceptable higher education practices. Within documents provided to peer reviewers the, "Eligibility Review Panel Scoresheet" (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010a) asked reviewers to rate an institution's ability in determining academic credit and transfer credit regarding eligibility for accreditation. Criteria 11 and 12 asked for ratings on "1) Criteria for awarding academic credit are developed; 2) Criteria represent good practice in higher education; 3) Careful standards if credit given for life experiences; 4) Policies expressed on accepting transfer credits; and 5) Qualified person(s) making decisions" (p. 2).

Documentation found and analyzed from WASCSenior did not provide a credit hour definition. However, based on P11's interview, credit hour values were presented in Table 4.6 (see Appendix S for more detailed information).

Responsibility

As portrayed in *How to Become Accredited: Procedures Manual for Eligibility, Candidacy, and Initial Accreditation* (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010b), institutions have the responsibility to prove themselves worthy to receive accreditation. This included demonstrating acceptable practices common to higher education such as academic credits. "Academic credits based on generally accepted practices in degree-granting institutions of higher education….[and that there are] institutional policies on award of credit" (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010b, p. 7). Acceptable practices also include accepting transfer credits and other nontraditional learning (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010a, 2010b, 2010c). Please see prior WASCSenior Credit Hour Definition section for more information.

In *Protocol for the Review of Distance Education Programs* (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010d) and *Guidelines for the Evaluation of Distance Education (On-Line line Learning)* (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2009), WASCSenior referenced federal regulation to indicate that the commission was required to "demonstrate that it is evaluating distance

Table 4.6

WASCSenior Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Typical student 1 credit				Combination to equate to 40-45 hrs			40-45 hrs
Typical student 3 credit course				Combination to equate to 120-134 hrs			120-135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. Created from Participant 11 interview, representing WASCSenior, interview data.

correspondence education program" (p. 1). The release of these documents was designed to assist peer reviewers to conduct institutional reviews. Also noted within the documents, WASCSenior had requirements for institutions regarding distance education courses and programs. Institutions were required to establish that students taking distance education courses were the same persons participating in, completing the work, and eventually receiving academic credit. Peer reviewers were instructed to make inquiries of institutions concerning their distance education courses and programs. One part of the investigation included "evidence of evaluations comparing the educational effectiveness of distance or correspondence education programs (including assessment of student learning outcomes, student retention, and student satisfaction) to ensure comparability to campus-based programs" (p. 2).

Translation Policy

P11 indicated that institutions were held responsible through policy and guidelines. Regional peer reviewers were trained for their tasks. Together, training and professional judgment, and peer reviewers' evaluation of institutions, determined how well an institution was doing in regards to standards. The time students took for learning each week, 40-45 hours per credit, was reviewed and considered during a review of an institution. The same expectations of traditional students were also expected of students engaged in distance education. Regardless of the format of learning, face-to-face or nontraditional education, the time involved in learning was expected to be the same. The commission reviewed institutions to see if they had policies and practices that were "based on common institutional practice in [the region] and are consistent with practices

of regionally accredited institutions elsewhere in the United States." P11 stated about institution reviews:

> What we try to do is see mostly if the institutions are offering a program and the courses with them that are rigorous enough as the right level that would require a student who passes to learn certain things and to get there by tasks that require them to engage deeply with the subject matter by reading, doing assignments, participating in chat, participating in class discussion—whatever the methods are.

According to P11, there was a significant amount of institutional review conducted during a substantive change request and process. P11 discussed the differences between an institutional review and a substantive change review. The former reviewed the entire institution including mission, financial, governance, academic and so forth. P11 described the institutional reviews as involving, "an entire institution and that includes every aspect of how it operates and offers." Substantive change process focused on a program within an institution and evaluated only what pertained to the program under review. P11 stated that, "if institutions are seeking to offer new programs that meet a certain definition, they have to go through this special level of scrutiny before they can be offered."

P11 discussed substantive change that related to courses which were more than 50% online since federal rule required institutions to submit explicitly detailed proposals for review and possible approval. Information reviewed included: (a) program goals and objectives, (b) educational online methodologies and tools, (c) course goals and objective, (d) learning outcomes, assessments and how assessments align with learning

outcomes, and (e) course sequences. P11 clearly indicated that close careful evaluation of course equivalency of learning and course credit hours.

P11 discussed how through substantive change process and review that more specifics were assessed:

> We have a special protocol for doing that [review]. It requires us to look at the outcomes to see if they are appropriate for the number of credits awarded. Then we look at the course syllabi, assignments, and we get access to observe a number of courses online so we can go in as if a student so we can spy on what is happening. So, we check for equivalency that way. We are looking for a level and equivalency in time that would be spent. We are looking to see if the outcomes are appropriate for the level of course and the number of units awarded. We have been doing that for a long time. This is not a change. Nothing that I've told you is going to change with the new federal [regulations].

According to P11 the process in place was very thorough and was appropriate for the work of review and accreditation.

WASCSenior had a document that provided guidelines for institutions offering distance education. *Protocol for the Review of Distance and correspondence Education Programs* (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010d) was similar to guideline documents provided by other regional agencies. However, the focus provided instructions for reviewers when evaluating institutions' distance education programs. The guidelines addressed curricula matters as related to distance education. It was expected that online courses met the same stringent standards and requirements of traditional courses, including benchmarks against

campus-based courses and programs. Institutions were also required to maintain that courses and content were rigorous and academically appropriate to the level of education and subject. Another document provided by the region, *Guidelines for the Evaluation of Distance Education* (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2009) provided the same information as the former document.

The region provides *Eligibility Review Panel Scoresheet* (Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities, 2010a) for peer reviewers when evaluating eligibility of institutions for accreditation. Evaluators indicate an institution's performance based on a ranking ranging from "1 (Unclear or inadequate) [to] 5 (Strong, clear development)" (p. 1). Several of the criteria were based on faculty involvement in curriculum, academic goals, and learning outcomes. "Criteria 11. Academic Credit" and "Criteria 12. Transfer Credit" (p. 2) addressed credit hours in some fashion. The commission's criteria were in place to ensure that policies and procedures were in place for the assignment of credit hour values and if qualified persons made decisions concerning credit hours and curricula.

WASCSenior had guidelines for its member institutions. The commission also had a review process in place. However, no policy was found addressing the determination of credit hour values for traditional or online courses.

WASCSenior Summary

As with other accrediting agencies, WASCSenior used the Carnegie Unit understanding for its credit hour foundation. However, no data were found on the actual assignment of credit hour values noting one instructional hour plus two student hours of

preparation. WASCSenior provided guidance to institutions and reviewers on assessing institutional effectiveness and accreditation compliance. The commission placed emphasis on the importance student learning and learning outcomes. No policy or procedure was found providing credit hour translation for online education.

Analysis

Unlike other international education systems, American education tracked learning by using what was commonly known as the credit hour. The credit hour was unique in that it used time as its base measurement. From its inception to today's common practice, the credit hour has been defined using time as the basic metric of learning. There has been little change in the definition of a credit hour since its introduction into U.S. education even though education was no longer limited to time in a classroom with an instructor. Data showed that use of the credit hour remained the same during the past century of use.

The three components of credit hour definition, responsibility, and translation policy used in the prior sections were used to provide a response to Research Question 1: What methods do national and regional policies set forth for determining the translation of asynchronous online class time into credit hours? The three elements were used to assist the reader in understanding credit hour use with asynchronous online education. This analysis section concludes by piecing together the individual parts.

Credit Hour Definitions

The commonality of the credit hour existed through higher education. However, the mutual practices did not operate from the same exact meaning. Four credit hour definitions were found in the study. The first credit hour was that of the Carnegie Unit,

the original credit hour. This equated to five instructional classroom hours of 45-55 minutes per week over the duration of a school term. The second type of credit hour was with an instructor directly involved; label "common practice" credit hour for this discussion. Learning time value was assigned to one instructional hour plus two student preparation hours for 15-week term. A third credit hour type was similar to the second with the exception that the instructor may not be directly involved with learning. Instead, there appeared to be more responsibility expected of learners. This type of credit hour was labeled as a "student led" credit hour. The result was one instructional hour plus two student preparation hours for 15 weeks of a semester. However, the addition of "time as determined" was added to the total learning time as instructors deemed needed. Thus, 15 weeks of a varied amount of time was added to the base one instructional hour plus two student preparation hours. A minimum of 60 hours of time would be involved. The fourth, and final, credit hour type was that which was now provided from the *Program Integrity* ruling; labeled "equivalency to" credit hour. This type of credit hour was based on the common one instructional hour plus two student preparation hours. There were no additional hours provided in the *Program Integrity* definition. The key distinction of this credit hour compared to the others is the phrase "equivalent to". These four credit hour types are discussed in more detail in the text that follows. Table 4.7 portrays the four types along with a breakout of the time values included in the meaning. An important notation is that the values presented are for one credit hour value.

Data demonstrated that time associated with a credit hour is normally considered in hours instead of minutes that define time in class. However, the hours were not equivalent to clock hours, or 60 minutes. Instructional hours were based on 50 minutes of

Table 4.7

Analysis of Learning Time per One Credit Hour

Credit hour type	Class(es)/week	Time/class	Extra learning time	Total learning hours per credit hour
Carnegie Unit	5	40-55 mins		75 hrs / 3,000-4,125 mins
Credit hour with instructor	1	50 mins	2 hrs	45 hrs / 2,250 mins
				45 hrs + 15X / (60 hrs minimum)
Credit hour without instructor	1	50 mins	2 hrs + X hrs	2,250 mins + 15X mins
Program Integrity credit hour	1	50 mins	2 hrs	45 hrs / 2,250 mins

Note. Carnegie Unit data did not provide number of weeks within a term. Applying the common practice of 15 weeks per semester, which was the number of weeks found with other credit hour definitions, was used to calculate the total learning hours. Credit hours, even though based on number of minutes in class, were presented by hours matching terminology used within credit hour definitions.

class instructional time. Student preparation time was not defined in a way other than hours. Thus, application of the commonly held practice of 50 minutes was applied to student learning or preparation time. The same application applied to any extra learning time required or as determined by instructor; allotment of extra time was discussed in detail within prior sections of this chapter. The resulting total learning time, then, was presented in hours relative to the credit hour meaning.

Carnegie Unit. Originally, the credit hour was known as the Carnegie Unit, since adoption of credit hour practices was required to receive Carnegie Foundation funds for teacher retirements. The unit began as five instructional classroom hours of 45-55 minutes per week over the duration of a school term. The time in a school term was not clearly defined in the data. Using the common practice of 15 weeks of time per semester, the total amount of time is 45 learning hours (see Table 4.7 for specific details).

The Carnegie Unit (see Table 4.7) was compared to the other definitions of credit hour. A noticeable difference of the Carnegie Unit was that instructional time was based on five class sessions per week. The class time, or instructional hour, was a range instead of 50 minutes. The mean of the class minutes equaled the common practice of 50 minutes. Application of the common 15 week semester term produced 75 learning hours.

Credit Hour with Instructor. A common practice developed resulting in some changes to the original design and use since the introduction of the credit hour. The next type of credit hour definition is education that involves direct involvement of an instructor. This may have been considered traditional classroom education. This type of credit hour was based on one class with instructor and learner interaction meeting once a week for 50 minutes plus the addition of two student preparation hours. This was the

same amount of time as one instructional hour plus two student preparation hours. This additional two student preparation hours became common practice for the remaining credit hour definitions. Over the course of a 15-week semester, 45 learning hours were involved for one credit hour.

Shown in Table 4.7 was this type of credit hour relative to the other defined types. The first significant difference was the amount of class times per week. Data showed the loss of four classes per week. Instead of a range of 40-55 minutes, the mean of 50 minutes became the standard. As indicated in previous discussion, the addition of two additional hours of student preparation or study time was now part of the common credit hour. The value of the credit hour was 45 hours, which was 35 less hours of learning time than the original Carnegie Unit.

Student Led Credit Hour. The third type of credit hour defined in data changed the role of the instructor. For this type of credit a teacher was not likely to be directly involved with learning. This type of learning was labeled as a student led credit hour since the learning required more student responsibility. An educator may or may not be part of the designated "class time." There was continuation of the standard of two student preparation hours. The base of one instructional hour plus two student preparation hours required additional time as determined by the instructor. The result is an additional 15+ hours included in the learning time, or one instructional hour plus two student preparation hours plus as determined hours; this equated to 60 hours minimum of learning time.

The time allotted to student led credit hours was also displayed in Table 4.7. The similarities of this type of credit hour to the common practiced credit hour were easily distinguished; one instructional hour plus two student preparation hours. Likewise, the

differences between Carnegie Unit and credit hours without an instructor were shown, which was similar to the common practiced credit hour. The lack of direct involvement of an instructor increased the amount of learning time required of learners. At a minimum, an additional 15 hours of learning time were required to counter act the lack of instructor involvement. At a minimum 60 hours of learning time, credit hours without an instructor, were more similar to the Carnegie Unit than the common practice credit. However, the additionally required learning hours still did not equate to the Carnegie Unit's 75 learning hours.

Equivalent to Credit Hours. With the introduction of the federal rule, *Program Integrity Issues* (2010c), the credit hour definition was now legally provided so all involved in American education, as recognized by the U.S. Department of Education, operated from a defined standard.

> Equivalency that reasonably approximates not less than—(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester….or (2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours. (Program Integrity Issues, 2010c)

Similarities were easily seen with the latter two credit hour definitions previously discussed; see Table 4.7. As with the credit hour with instructor and credit hour without instructor, a credit hour based on equivalent to definition was less than a Carnegie Unit total learning time. Equivalent to credit hours equaled the commonly practiced credit

hour, or credit hour with instructor involved. The definition provided in federal rule did not include the additional hours as determined, which were included in the credit hours without direct instructor involvement. All learning types and the time involved, regardless of modality and location, were defined the same. Therefore, all U.S. education now operates from the same foundational credit hour definition: an equivalency to one instructional hour plus two student preparation hours equaling 45 total learning hours per credit hour.

With or Without Definition. The regional commissions operated from a common understanding of a credit hour. Generally, that consensus was one instructional hour plus two student work hours. The listing shown in Table 4.8 provides a summation of each accrediting agency's documentation and translation policy. All but one agency had a documented credit hour definition. None of the commissions had a policy to translate asynchronous online education into credit hours. All of the regional agencies did operate with the understanding that all online education would be equivalent to the amount of learning that took place in a classroom. Content, objectives, and course structures were also anticipated to be similar to traditional learning.

Definition Summary. With the exception of the Carnegie Unit, the credit hour was based on one instructional hour plus two student preparation hours for 45 total learning hours per semester. Before *Program Integrity Issues* (2010c), additional hours may have been added as determined by instructor. The result would be 60+ learning hours per credit hour. With the *Program Integrity Issues* definition, all learning regardless of modality and location became equivalent to the common practice before the ruling of one instructional hour plus two student preparation hours.

Table 4.8

National and Regional Documented Definition and Translation Policies

System	Credit Hour Defined	Translation Policy	Online Credit "Equivalent To"
DOE	Yes	No	Yes
MSCHE	Yes	No	Yes
CIHE	Yes	No	Yes
HLC	Yes	No	Yes
NWCCU	Yes	No	Yes
COC	No	No	Yes
WASCSenior	Yes	No	Yes

No other uniquely different definitions were found in the data. A definition was not found that applied to asynchronous online education. Before the *Program Integrity* ruling, learning that did not include direct instructor interaction, as found in a classroom setting, required more learning time. Since asynchronous online education may not directly involve an instructor and that asynchronous online education was based heavily on student responsibility for learning, assigning credit hour values may have been based on one instructional hour plus two student preparation hours plus additional learning time as determined by instructor. Learners involved in student led credit hour education would thus be required to dedicate 60+ learning hours per credit hour.

No descriptors were found that defined how much learning took place within a credit hour. This was found true of all four credit hour definitions. The nonexistence of any objective measures resulted in arbitrary and inconsistent credit hour assignment. The Carnegie Unit referred to learning within a classroom. The commonly practiced credit

hour was based on one instructional hour in a classroom with instructor plus two study hours. The definitions found did not provide how much learning or work took place for either the classroom or the student study time. The same lack of a defined amount of learning was true for student led credit hours. Student led learning was further complicated by "as determined" time added as an instructor chose. There was indication of the modality of learning, but none of the first three credit hour definitions delineated parameters to the quantity of learning that must take place within the expected learning time. Again, the same subjective practice applied to the new *Program Integrity* (2010c) equivalent to credit hour. Determining the equivalency to the learning that would normally take place with one instructional hour plus two student preparation hours relied on persons' perceptions of the learning involved in those time constraints.

There were no determinate measures that could concretely distinguish the amount of learning within any time frame. Applying a credit hour framework to asynchronous online education was equally unreliable for assigning credit hour value. Credit hours were capable of representing an amount of time similar to an employer tracking employee work hours. None of the credit hour definitions provided any tested benchmarks as standards for an amount of learning that took place within a set amount of time. Other factors that affect learning may include learning quality, environment, subject difficulty, prior learned knowledge, learning style, and learners' capabilities.

Responsibility

Reviewing responsibilities before and after the *Program Integrity Issues* (2010c) ruling did not reveal any significant change of responsible parties. There was a difference in regulations as it pertained to authoritative charge. Before the ruling, responsibility for

the credit hour was primarily placed on the institution by accreditation standards. Following the ruling, however, federal regulation assigned duties to accrediting agencies and institutions. Both before and after the ruling, the DOE could determine if any institution or accrediting commission was conducting practices inappropriately.

Pre-Program Integrity. Before the *Program Integrity* ruling, the U.S. Department of Education operated with the expectation that accrediting agencies and higher education institutions would maintain commonly held practices of determining credit hour values. Within the DOE regulations and guidelines, there was no absolute responsibility assigned to either commissions or institutions. The DOE relied on accrediting commissions to act as gatekeepers of educational quality and credit hour use. When an issue became apparent, the DOE would examine commission practices and regulations to determine if the agency was operating with best intentions and oversight of institutions. The DOE also examined institutions against standards. If the department determined that an institution was not compliant with the DOE's perception of commonly held higher education practices, then the institution and the respective accrediting commission would receive notice of the DOE's findings and would need to work to resolve perceived infractions.

Accrediting commissions also placed responsibility on institutions for proper determination of credit hour values. The judgments made by a commission were based on the commonly held practices within higher education as interpreted by peer reviewers. All commissions followed the one instructional hour plus two student work hours of learning as the basic credit hour value. Agencies made judgments on institutional policies and practices primarily on program and degree level. Specific course level reviews were not commonly conducted. Accrediting agencies also required institutions to document

and substantiate any non-traditional determination of credit hour values. Institutions were also expected to have documentation explaining how credit hour values were assigned.

Post-Program Integrity. Following the *Program Integrity Issues* (2010c) ruling, federal regulation designated accrediting agencies responsibility to govern institutions and ensure compliance. As before, accreditation agencies would continue to require institutions to maintain common practice and to document and substantiate any traditional and non-traditional determination of credit hour values. Institutions became fully and legally responsible for their credit hours. The difference found within data was common practice versus federal rule. Pre-ruling responsibility was based on commonly held practices. Post-ruling, responsibility was now part of federal rule. The credit hour base was judged to be the amount of learning equivalent to what would occur with one instructional hour plus two student work hours.

Responsibility Summary. Whether before or after the *Program Integrity* ruling, responsibility ultimately fells on the local institutional level. The DOE relied primarily on accrediting commissions to maintain standards. Agencies designated credit hour duty to institutions requiring them to document and validate credit hour determinations and values. Agencies would then hold institutions accountable to commission standards. Data indicated that many institutions have departmental curriculum committees and that persons on the committee are subject matter experts. Following an organizational structure may or may not show an intermediate level of review before any curriculum and credit hour decisions were presented to the institution's main academic office and officer. There was very little focus beyond the local level on individual course credit hours. Instead, program and degree level reviews were the focus of accrediting commissions.

Regardless of responsibility level, agencies and the DOE both claimed jurisdiction to judge institutions for credit hour policies and practices. Without a concrete, measurable, and objective credit hour definition, any determination of credit hours was a value judgment based on perceptions and experiences. Thus, any determination of credit hour values specifically for asynchronous online education was the same before and after the ruling. What data showed was the expectation that any non-traditional education, in this case any asynchronous online learning, would parallel that found in a traditional classroom setting. This allowed application of one instructional hour plus two learning hours common practice. Like traditional education, translation of asynchronous online education into credit hour values was an arbitrary, subjective, and judgmental determination of a value and the amount of learning.

Translation Policy

Before the *Program Integrity* ruling, specific policy and translation practices concerning asynchronous online education into credit hour values did not exist beyond the commonly accepted practice within higher education of determining credit hour values. Judging the amount of learning that would take place during one instructional hour plus two student preparation hours. Equating asynchronous online education to classroom education was a matter of paralleling traditional learning and online learning. Therefore, the online class would include the same work and elements of its on-campus counterpart. It was not made clear in data that asynchronous online education required extra learning time since an instructor was not directly involved.

The credit hour value of one instructional hour plus two student preparation hours became part of legal regulations with enactment of *Program Integrity* ruling. Based on

judgments, an equivalent amount of work involved in the traditional one instruction hour plus two student preparation hours became a base for all education. As faculty and administration placed a time value on educational work, credit hour assignment is made as it was before the ruling. The ruling eliminated the need for extra student work time. All learning in whatever format was now determined to be equivalent to what would occur in a traditional classroom setting: one instructional hour plus two student preparation hours.

Specific to asynchronous online education translation into credit hours, common practices that had been in place for decades may continue. The *Program Integrity* ruling aligned asynchronous online education equal to that of a traditional classroom. As long as the learning and work involved with asynchronous learning was equated to one instructional hour of instruction plus two student preparation hours, then an online class was justified with the amount of credit hours awarded. It appeared what was good common practice for traditional learning became acceptable for asynchronous online education. Yet, determinations of credit hour values may continue as has been common practice for over a century: one credit hour equals the amount of education that would occur within three hours of learning.

Translation Policy Summary. The *Program Integrity* ruling standardized the credit hour definition. By equalizing all credit hour determinations as equivalent to the learning occurring during one instructional hour of instruction plus two student preparation hours, educational modalities were no longer a concern when making value judgments about credit hours. Moving credit hour meaning to federal regulations aligned all education that was recognized by the DOE and accrediting agencies to the same value.

Whether learning took place in a classroom or asynchronously online, the education experienced by learners could now be considered the same.

Response to Research Question 1

No national or regional policy was found that addressed concretely the translation of asynchronous online education into credit hours. Instead, overlaying a credit hour onto all educational modalities became the norm within higher education. Any policy that associated asynchronous learning with credits indicated that all elements of a course from content to the amount of learning time had to equate that of a face-to-face class. The association of how much learning took place within an instructional hour was based on local level determinations within institutions and by faculty. The challenge, then, was to know what a credit hour represented for one as compared to another. As presented, some credit hours were based on instructional time only. Other credits included student work time. The role of the instructor was also a factor in regulating how much learning time was warranted for a credit hour. In another setting, the amount of learning time was not defined and rested wholly on what was considered rigorous, robust, and appropriate for content and academic level.

While the main responsibility for defining the credit hour was on the local level, the administrators of American education, the U.S. Department of Education and accrediting agencies, served as assessors and judges. The governing agencies had control to review and assess local level decisions. Assessment was based on their respective determinations and understanding of what was required for a credit hour and the education associated. Regardless of where education took place, translating education

into credit hours was based on judgments. The latest ruling of the DOE perpetuated subjective determinations of credit hour values.

CHAPTER 5

PUBLIC UNIVERSITY SYSTEM POLICIES AND PRACTICES

The purpose of this chapter is to present findings from the examination of public higher education systems as related to Research Question 2 of this study: What methods do system policies set forth for determining the translation of asynchronous online class time into credit hours? The findings were alphabetically organized by system. Information gathered on each system was subdivided by categories of credit hour definition, responsibility, and translation policy. The final portions of the chapter were an analysis of the findings and a response to Research Question 2. As discussed in Chapter 3, document and policy analysis were conducted for this study. Interviews were conducted to confirm outcomes of document and policy examination. Together, research questions, interviews, and document and policy analysis guided the research to the findings being presented.

During the research phase of this project, the U.S. Department of Education (DOE) released *Program Integrity Issues: Final Rule* (2010c) and subsequently the *Dear Colleague Letter* (Ochoa, 2011). Depending on date of interview as well as assimilation of the DOE information, participants may or may not have discussed any impact of the DOE's ruling. Lastly, interviewed participants were indicated in this chapter with the letter 'P' followed by a randomly assigned two-digit number to represent the participant.

Public System: California

University of California (UC) system was chosen for the project based on Integrated Postsecondary Education Data System (IPEDS) information, determining it was one of the top ten state systems offering online distance education; see Chapter 3 for specific details. IPEDS data reported 657,963 enrollments (National Center for Education Statistics, 2010) for the 2008-2009 academic year, placing it first on the top ten list. Governance for University of California system was by a Board of Regents. A Systemwide Academic Senate represented faculty and campuses (Regents of the University of California, 2011), and was "empowered to determine academic policy, set conditions for admission and the granting of degrees, authorize and supervise courses and curricula, and advise the administration on faculty appointments, promotions and budgets" (Academic Senate, 2011, ¶1).

Credit Hour Definition.

Within UC system were ten campuses: Berkeley, Davis, Irvine, Los Angeles, Merced, Riverside, San Diego, San Francisco, Santa Barbara, and Santa Cruz. As mentioned, a Board of Regents and System Senate governed these campuses (University of California, 2011). Researching within the system documents produced mixed results. UC, itself, did not define a credit hour. Instead, UC referenced to the definition provided by the Postsecondary Education Commission (2011).

Thus, one credit hour was defined as "A unit of measure representing an hour of instruction over a 15-week period in a semester or trimester system" (Postsecondary Education Commission, 2011, ¶115). Similar terms such as "credit" (¶112) and "credit unit" (¶116) were also provided, but with varied definition from the credit hour.

Respectively, a credit was "recognition of attendance or performance in an instructional activity (course or program) that can be applied by a recipient toward the requirements for a degree, diploma, certificate, or other formal award" (¶112). In another paragraph a credit unit was defined as "a measure describing coursework at institutions of higher learning" (¶116). Both of which, were associated to a measurement of instructional time. During the interview, P16 was not aware of or had any knowledge of a UC documented credit hour definition. P16 stated that, "we define credit hour as the expected amount of work required to master the material: readings, online participation, assignments, and so forth." P16 emphasized the importance of UC's curriculum review process and described the evaluation as "in depth and rigorous." The process described indicated that each course and program was reviewed at the local level and would include final approval from the system level. When asked specifically how credit hour values were assigned to online courses, P16 stated that, "courses must match on-campus courses, the amount of work, and content." P16 was not aware of any solely online courses without a traditional face-to-face class match.

Due to the lack of specific information, a detailed table presenting a summation of UC's credit hour values was not possible. However, since the only indication of time was a reference to an instructional hour, an estimated synopsis was constructed (see Table 5.1).

Responsibility.

The UC system created an intercampus course offerings program to allow students more course offerings and was established to "minimize bureaucratic barriers" (Alvarez-Cohen, 2004, p. 1). Noted in the communication was that distance education

Table 5.1

California Credit Hour Values

	Time/Week			Time/Semester			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Lecture 1 credit	1 hr			15 hrs			15 hrs
Lecture course 3 credits	3 hrs			45 hrs			45 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from Postsecondary Education Commission. (2011). *Glossary of Terms: Definitions of Education Terms*. Retrieved June 16, 2011, from http://www.cpec.ca.gov/SecondPages/Glossary.asp

allowed students more offerings of courses. The communication stated a principle about credit hours: “All courses available to be taken by UC students under SR 544 should be treated the same, for purposes of course credit, regardless of the format (in person or at a distance) in which the course was offered” (Alvarez-Cohen, 2004, p. 3). The student’s home or primary campus had the responsibility for verifying course content and quality as pertinent to its degree program and course offering even though the campus offering the distance education course had primary responsibility to academic quality and credit hour values (Alvarez-Cohen, 2004; Pitts, 2004). Determining credit transference was similarly explained in the Postsecondary Education Commission (2011) data reference in California documentation.

In his communiqué to UC Provost and Executive Vice President, Simmons (2011c) discussed how local campus curriculum committees were responsible for determining credit units for a course based on the campus’ term structure. Committees also had responsibility to provide credit values for term structures that other institutions may have; i.e., quarters or semesters. The University Committee on Education Policy would determine alternate credit values as needed. In a report about study abroad courses, concern was raised determining credit hour values. The report presented the argument that there were “serious problems” (Joint Ad Hoc Committee on International Education, 2007, p. 8) within UC system. The report indicated that consistency in review and assigning academic credit were needed so credits earned on one campus would be accepted at other campuses.

Translation Policy.

In 2010, UC Academic Council endorsed an online pilot program. Simmons (2011a) provided summation of voiced concerns and actions the Academic Council took. The council found that there was not a "coherent curriculum design" (p. 1) within the system. A concern also voiced was that of credit transfer from proposed online courses to institutions within the system. Guarantee was needed that credit transfer would not hinder students taking online course work. Online courses that were part of the pilot program were "subjected to independent rigorous review….[in order to produce] a high-quality online component to UC education" (p. 2). Simmons (2011b) presented information that expressed similar concerns as the previous document, and again emphasized that producing quality education was a goal of the council. Procedures were discussed briefly for curricula approval. The process was to begin with course committees at the local level. Committee members would be responsible to assess proposed online courses against the same standards as on-campus courses. Additionally, local committees had to approve pedagogy and course content. Online courses became subject to divisional and system approvals. Students' home campus and departments had the final determination of "whether a course will be accepted as credit for the [student's] major" (Simmons, 2011b, p. 3). This review process was similar to the procedure described by P16 during the interview.

UC did have procedures in place for course and program review and approval. The responsibility fell primarily on faculty at the local level with divisional review and system review assessing faculty decisions. Faculty reviews were expected to be rigorous and thorough. In similar fashion, a campus receiving credit from another institution had

the responsibility to assess the credits and courses in order to ensure standards met criteria. Even though a course was approved for system wide use, local campuses were encouraged to openly accept credit for a system course, but the local institution still had the choice to assess and determine final transfer credit values (Alvarez-Cohen, 2004; Simmons, 2011a, 2011b).

California System Summary.

Documentation indicated that UC placed focus on providing quality education. There were review processes in place that were designed for the rigorous review of quality, content, and pedagogy. Research did not find any data that indicated UC had specific policy or procedures to translate online asynchronous education into credit hour values. Also, UC did not provide a detailed definition of a credit hour. The only element of time associated with California's credit hour was associated with an instructional hour (Postsecondary Education Commission, 2011).

Public System: Florida

The State University System of Florida was chosen for the project based on Integrated Postsecondary Education Data System information, determining the top ten state systems offering online distance education (see Chapter 3 for specific details). For the 2008-2009 academic year, IPEDS reported Florida had 463,684 students enrolled (National Center for Education Statistics, 2010) in its public higher education institutions for the 2008-2009 academic years, placing it third on the top ten list. Data indicated that a Board of Governors oversaw the university system. Florida did have an advisory board for online education, Florida Distance Learning Consortium. Described by P10, the consortium was an advisory body working with Florida's higher education institutions

and the Board of Governors to work with, support, and coordinate the distance education offerings of Florida's universities, and to provide a "one stop shop" for students interested in distance education. Other duties include learning repository, leveraging buying power, and training.

Credit Hour Definition.

P10 provided lengthy discussion about credit hours and the DOE rule making (See Chapter 2 and Chapter 4 about *Program Integrity Issues: Final Ruling* (2010c).) During our interview, P10 stated about credit hours:

> Generally, we view our courses and credits earned for them the same way, regardless of the mode of delivery. There was a general state-level policy (6A-10.033 Rule) regarding contact hours per credit hour, but it does not address online or asynchronous learning. Each university and college must make that determination for each such course…[P10 then referred to the following Florida standard and website: SBE 6A-10.033, Credit Hour Definitions: https://www.flrules.org/gateway/RuleNo.asp?title=MISCELLANEOUS&ID=6A-10.033].

P10 also indicated that valuing courses for credit hours was "strictly within the purview of our institutions."

Florida's law defined a credit hour for its higher education institutions within the *Postsecondary Credit Definitions* (2005). There were two main classes of credits: credit and noncredit. The former was the information needed since noncredit concerns continuing education, community classes, and the like. Generally, credit hours had distinguishing components: (a) a unit assigned to learning, (b) an award of a

postsecondary certificate or degree as appropriate, (c) an indication of learning completed, and (d) a recognition of learning independent of where studying occurred. On this basis, three types of credit were sanctioned for Florida's system: (a) college credit, (b) career credit, and (c) preparatory credit (Postsecondary Credit Definitions, 2005).

Florida's credit hours were assigned to indicate "how much of a program the learner has completed" (Postsecondary Credit Definitions, 2005b) regardless of where a person learned. A college credit was "credit assigned to courses or course equivalent learning that was part of an organized and specified program leading to a graduate, baccalaureate, or associate degree" (Postsecondary Credit Definitions, 2005b). Florida's assigned time values for a credit are shown in Appendix T and described as follows:

> College credit was based on the learning expected from the equivalent of fifteen (15) fifty-minute periods of classroom instruction; with credits for such things as laboratory instruction, internships, and clinical experience determined by the institution based on the proportion of direct instruction to the laboratory exercise, internship hours, or clinical practice hours. (Postsecondary Credit Definitions, 2005b)

Class instruction time was similar to other definitions discussed. Learning by experience was at the discretion of the institution relative to "direct instruction." Career credit applied to career courses on the postsecondary level. One career credit contained "the learning expected" as college credit. The time, however, was portrayed as 30 hours of instruction. Preparatory credit was assigned to course work that prepared persons with "additional academic preparation" for college enrollment. The description was similar to that of a college credit:

> Learning expected from the equivalent of fifteen (15) fifty-minute periods of classroom instruction, with credit for such things as laboratory instruction and individualized study determined by the institution based on the proportion of direct instruction to the laboratory exercise or individualized program. (Postsecondary Credit Definitions, 2005b)

A distinguishing factor was that preparatory credits were competency-based and the related course work was to "develop college entry competencies." Competencies were in reading, writing, and mathematics at the college level, or academic preparation for career oriented persons. See Table 5.2 for a portrayal of the basic credit hour value as defined by Florida. The definitions found did not distinguish per week or per semester. Based on comparison to a traditional credit hour, information for Florida credit hour most closely matched that found in time per semester. Calculating the equivalents, then, was based on the following understanding: (a) 50 instruction minutes was considered 1 class hour, (b) 15 periods equates to 15 weeks of a semester or 15 class hours, (c) preparatory and extra time noted in other tables cannot be defined since was as determined by Florida institutions.

An important distinction between Florida's definition and credit hour descriptions by other agencies was that Florida did not provide detailed guidance for time outside of the classroom. Extra study time was left to institutions valuing "credit for such things as laboratory instruction and individualized study determined by the institution based on the proportion of direct instruction to the laboratory exercise or individualized program" (Postsecondary Credit Definitions, 2005b). Therefore, the total time indicated in Table 5.2 did not equal the time noted in the majority of accrediting agencies' credit hour

Table 5.2

Florida Credit Hour Values

	Time/Week			Time/Semester			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
College credit 1 credit	1 hr			15 hrs			15 hrs
College credit course 3 credits	3 hrs			45 hrs			45 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from *Postsecondary Credit Definitions*, 6A F.A.C. §10.033 (2005).

Tables (see Chapter 4). The Florida figure was 30 hours less than the standard classroom-based credit definition provided in other sections. However, Florida's hours for career credit was twice that of the college credit. The additional time was similar to that of experiential learning time presented previously in Chapter 4.

P10 did not recall any online course work that was not a "shadow" of campus-based courses. Therefore, credit hours for the online version would be the same as a equivalent campus class. P10 how many believed that online courses were more rigorous than campus courses; thus, the credit was well earned. P10 believed that institutions had not thought about assigning credit hour values to either online or campus course work until recently. P10 speculated that recently someone must have asked, "How do you know or on what basis do you assign a distance learning course a credit hour…[and] for a traditional course." P10 indicated that no decision had been made about how to assign credit hours to online education. P10 indicated that some conversations were about institutional benchmarking to assign equivalent hours. P10 raised concern about this issue, wondering why the question was not about, "How do you know students are learning instead of how do you assign a credit value?"

Responsibility.

Regulations that articulated credit transfer within Florida's postsecondary system were contained in *Articulation Between and Among Universities, Community Colleges, and School Districts* (2005a) were regulations that articulated credit transfer within Florida's postsecondary system. The legislation indicated that receiving institutions had the responsibility to judge another institution's credit values as appropriate against the standards set in the rule. This included equivalency to the receiving institution's courses

and common credit hour values. The statement also instructed state institutions to enter into articulation agreements with the other state entities assisting students to complete course work as rapidly as possible. There was no indication of the time values of credit hours or any definition of what credits may be worth. The *Postsecondary Credits Definitions* (2005b) document contained words that associated credit values to those presented in the previous section.

Translation Policy.

Florida did not address learning and translating credit hours for online education. As P10 indicated, online courses were shadows of face-to-face classes. Therefore, the credit hours would be the same with the same learning expectations; P10 stated, "we view our courses and credits earned for them the same way, regardless of the mode of delivery." As discussed, Florida institutions were beginning to ask how determination of credits was correct for on-campus and off-campus courses, including online education. P10 indicated that ascertaining credit values may be the result of a regional accreditation review and/or the DOE's *Program Integrity Issues: Final Rule* (2010c).

During the interview, P10 brought up the topic of "academic freedom" and discussed how institutions were certain that credit hour values were just. Decisions were made based on the professional judgment of faculty who were subject matter experts and understood the dynamics of higher education learning. Therefore, "there will be variation," but learning was the primary concern. P10 suggested that resources from Western Cooperative for Educational Telecommunications (2001, 2009) and Sloan Consortium quality pillars (2011a, 2011b) for review. A review of materials and search

of documents did not indicate information relative to translating online education into credit hours.

Florida Summary.

Florida did have a credit hour definition, which was part of the state's regulations. At its most basic level, Florida's credit hour was similar to traditionally defined credit hour; i.e., 50 minutes (one instructional hour) per week for 15-week term totaling 15 instructional hours per term. Not included were the expected two hours of student preparation time as defined in other system documents. College credit, career credit, and preparatory credit were distinguished within Florida regulations. A distinction between credit types appeared in how each type was used. College credit was used as credit hours are traditionally used in other institutions. Career credit was used similarly. However, career credit required twice the learning time per credit hour (30 hours) than college credit (15 hours). Also, these credits were indicated as career courses on a higher education level. In a similar fashion, preparatory credits were for courses that prepared students with expected college entrance competencies, but were based on 15 hours per term instead of 30 hours.

Review of the data did not find any policy or procedure instructing how to translate online learning into credit hour equivalents. P10 reiterated documentation that credit hours were the same regardless of the modality. P10 indicated that all the online courses known followed the same expectations, standards, and mirrored on-campus courses. Also mentioned during the interview, institutions were beginning to consider how to validate credit hour assignment.

Public System: Georgia

A Board of Regents oversaw The University System of Georgia's public postsecondary institutions, public libraries, and Skidaway Institute of Oceanography (University System of Georgia, 2011). Georgia's system was chosen for the project based on IPEDS information, determining it was one of the top ten state systems offering online distanced education; see Chapter 3 for specific details. IPEDS indicated that Georgia had 236,355 student enrollments; placing it seventh on the top ten list for the 2008-2009 academic year. An interview was not possible. However, several email exchanges occurred in which P18 provided answers or directed responses to University System of Georgia resources.

Credit Hour Definition.

Georgia's credit hour policy was similar to Florida's. According to P18, Georgia's definition reads:

> All USG institutions shall be on the semester system….The academic year shall consist of two (2) regular semesters, each not to be less than fifteen (15) calendar weeks in length, excluding registration. A minimum of 750 minutes of instruction or equivalent was required for each semester credit hour.

This definition was taken from *Board of Regents Policy Manual* (University System of Georgia, 2010). Displayed in Table 5.3 are basic credit hour values for Georgia. Calculating credit hour equivalents was based on the following understanding: (a) 50 instruction minutes was considered 1 class hour, (b) 15 periods equates to 15 weeks of a semester or 15 class hours (750 minutes), (c) preparatory and extra time noted in other tables cannot be defined since it was as determined by the institution.

Other documentation provided more details on how the system used credit hours. Within *USG Handbook for Developing and Maintaining Study Abroad Programs* (University System of Georgia, 2009b) was a list of considerations for determining credit values for study abroad learning. Allocation of credit criteria included:

> (a) The program should include roughly 80% of the contact hours required for campus credit….(b) Determine the realistic amount of time the student can be devoted to both in-class instruction and out-of class homework, activities and study. (c) Devise the program's schedule so that hours of instruction include lectures before, during, and after the overseas portion of the program. (d) The duration of your program and the required number of hours of in-class instruction per day will help determine the maximum and minimum number of credits students can earn through the program. (University System of Georgia, 2009b, p. 21)

Although time was a factor in making a determination, the amount of required time was 80% that of campus courses. For one credit hour, the approximate traditional instructional time would be 12 hours instead of 15 instructional hours.

Meeting minutes were found which described details between 1995 and 2009 versions of credit hour definition. The difference was the removal of the phrases: "minimum of 75 class days per semester" and "final examination periods" within the latter version (University System of Georgia, 2009a). It appeared that by removing the phrases the system focused on learning time and eliminated the requirement for designated meetings. This may have allowed for alternative scheduling and removed the need of synchronous online education.

Table 5.3

Georgia Credit Hour Values

	Time/Week			Time/Semester			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
College credit 1 credit	1 hr			15 hrs			15 hrs
College credit course 3 credits	3 hrs			45 hrs			45 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Create from University System of Georgia. (2010). *Board of Regents Policy Manual*: "3.4 Calendar of Academic Activities." Retrieved July 11, 2010, from http://www.usg.edu/policymanual/section3/policy/3.4_calendar_of_academic_activities/, and communication with P18.

Responsibility.

Data found in Georgia documents did not indicate any specific accountability for credit hours relational to online education. However, P18 provided information that indicated the system's institutions were making justified decisions which "ensure quality" in online course offerings. The belief was that local academic persons were responsible for decisions. Referral was made to Southern Association of Colleges and Schools documents and guidelines (see Chapter 4).

Translation Policy.

Other than the information provided in prior paragraphs, the University System of Georgia did not have any policies or procedures for translating online education into credit hour values. The lack of guidelines was confirmed by P18 stating, "the USG does not have different guidelines or policies for synchronous and asynchronous instruction when calculating credit hours."

Georgia Summary.

Georgia's universities had a system credit hour definition. This value was based on fifteen 50-minutes of instruction per credit. Although not presented the same, this was the same value as the traditional instructional credit hour. Georgia's definition did provide for "equivalent" instruction, possibly allowing for non-traditional learning. None of the data found addressed specific concerns for asynchronous online education credit hour values.

Public System: Indiana

The Indiana Commission for Higher Education provided oversight of public postsecondary institutions within the state. Indiana's system was chosen for this project

based on IPEDS data information, determining it was one of the top ten states offering online distance education (see Chapter 3 for specific details). IPEDS data indicated that Indiana was ninth on the list with 214,536 student enrollees for the 2008-2009 academic year.

Credit Hour Definition.

Documents from Indiana showed that the system used the traditional 50 minutes of instruction once a week to equal one credit hour. Like Georgia, Indiana used semesters across the system as its standard term. Like Florida, Indiana had types, or categories, of credits: credit hour (non-contract instruction), credit hour (contract instruction), and remedial credit hour (math and language) (Indiana Commission for Higher Education, 2010). Non-contract instruction was the basic credit hour and defined as "a unit of measure representing the equivalent of an hour (50 minutes) of instruction per week over the entire term" (¶21). As with traditional credit, Indiana's credit hours were applied to degree, diploma, or certificate indicating completion of a program of study. Contract instruction credit hour was

> Earned under a contractual agreement (also referred to a clock hours). The agreement was offered to a limited number of students and reimbursement for a portion or all of the cost of the instruction was awarded. Credit hours are not considered contract when an employer pays all or part of the student's tuition. (¶22).

Remedial credit hours were similar to Florida's preparatory credits. Remedial credit courses for Indiana were designed to prepare persons with competencies that were needed for entrance into higher education course work. It appeared that Indiana awards this type

of credit for language arts and mathematics (Indiana Commission for Higher Education, 2010).

During the interview P12 reiterated credit definition provided above from Indiana's documentation:

> A unit of measure representing the equivalent of an hour (50 minutes) of instruction per week over the entire term. It was applied toward the total number of credit hours needed for completing the requirements of a degree, diploma, certificate, or other formal award. All credit hours are reported as semester-hours and represent the hours in which the student was enrolled. (Indiana Commission for Higher Education, 2010; P12)

P12 indicated that Indiana's definition was drawn from the standard federal definition (pre-*Integrity Program Issues* ruling). Indiana followed the standard definition for approximately ten years. Calculating Indiana's credit hour values, as shown in Appendix U, followed the same understanding of Georgia and Florida: a) 50 instruction minutes was considered 1 class hour, (b) 15 periods equates to 15 weeks of a semester or 15 class hours, (c) preparatory and extra time noted in other tables cannot be defined since was as determined by the institution. Credit hour values are displayed in table 5.4.

As with other states discussed thus far, Indiana did not include any student preparation time or any extra time as was presented in Chapter 4. Even though Indiana did define three types of credit hours, all three follow the same basic definition: 50 minutes of instruction (1 traditional instructional hour) for 15 sessions (1 semester). The result was 15 instructional hours of course work per credit hour. The parameters found were different in that no student preparation or extra learning time was defined.

Responsibility.

P12 discussed that the system was beginning to consider guidelines for distance education. What was currently occurring for the system was institutions would submit proposals for new programs and degrees, which included online education. The responsibility of the Commission on Higher Education was to review the proposal and then approve the programs and degrees as appropriate. The review would include evaluating content, academic level, and rigor. Specifically addressing distance education, P12 answered the interview question about a policy for asynchronous online education, "the short answer for asking if we have any special definitions and guidelines for asynchronous online distance education, we do not." P12 discussed how the system had regular webinars scheduled in which the appropriate persons discussed issues and would make a unified decision for "consistent definitions not only for credit hours, but for many other information data collected" (P12). The state commission was able to develop uniformity and consistency through use of webinars with representatives throughout the system. This, in turn, resulted in better data collection and higher quality within Indiana's higher education system. An example provided was that the commission had not seen any significant discrepancies in credit hour values.

Translation Policy.

As noted above, Indiana did not have specific guidelines that addressed credit hour use with online education. According to P12, the understanding was that everyone used the definitions and guidelines for traditional credit hours. System members were beginning to discuss definitions of terms and expected application of definitions. As P12

Table 5.4

Indiana Credit Hour Values

	Time/Week			Time/Semester			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Non-contract credit 1 credit	1 hr			15 hrs			15 hrs
Non-contract credit course 3 credits	3 hrs			45 hrs			45 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time.
Created from Indiana Commission for Higher Education. (2010). *CHE Data Information Center Glossary*. Retrieved August 18, 2010, from https://www.che.state.in.us/SISAPI/Glossary.aspx; and P12 interview.

indicated, Indiana did not have any established policies and procedures specific to credit hour use with online learning.

Indiana Summary

Institutions in Indiana used the traditional 50 minutes of instruction per week for 15 weeks to equate to one credit hour. Indiana's use and application of a credit hour followed common practice in higher education. However, the state did not incorporate student preparation time into its credit hour definition. Reviews of course content, objectives, and structure began with the local department and institution. The local level was responsible, as well, for credit hour determination and application. The state level oversaw programs and would review specific courses as warranted. Indiana did not have a specific credit hour definition pertaining to asynchronous online education. P12 indicated that webinars were used so institutional representatives could communicate and determine "consistent definitions" and actions as related to online education and educational operations as a whole. P12 believed that working together through webinars, the state was consistent in its application and use of credit hour values.

Public System: New York

The Office of College and University Education, Division of Higher Education within the Board of Regents oversaw the public higher education system of New York (New York State Education Department, 2011). New York's system was chosen for the project based on IPEDS information, indicating it was one of the top ten state systems offering online distance education; see Chapter 3 for specific details. IEPDS data showed New York as fourth in the list with 384,234 student enrollees for academic year 2008-2009 (National Center for Education Statistics, 2010).

Credit Hour Definition

New York addressed credit hour translation for online education by defining a credit hour, providing guidelines for online education, and issuing guidelines to determine time on task in order to determine credit hour values. The person interviewed, identified by P20, was very resourceful and provided several links to the state's regulations and guidelines. During the interview, P20 referred greatly to the system's documentation.

For New York's higher education system, a credit was an "academic award applicable towards a degree offered by the institution" (State Administrative Procedure Act, 2010c). For New York, according to P20, a "semester hour" was the unit that was traditionally labeled a credit hour:

> Semester hour means a credit, point, or other unit granted for the satisfactory completion of a course which requires at least 15 hours (of 50 minutes each) of instruction and at least 30 hours of supplementary assignments….This basic measure shall be adjusted proportionately to translate the value of other academic calendars and formats of study in relation to the credit granted for study during the two semesters that comprise an academic year. (State Administrative Procedure Act, 2010)

P20 discussed how the definition was broad enough to incorporate non-traditional learning, such as online education. Yet, it followed the common standard of a Carnegie Unit: one instructional hour plus two student preparatory hours for 15 sessions. P20 indicated that New York did not stop with the definition. There were other guidelines that

provide assistance and understanding of how credit hour values were assigned to non-traditional learning. Credit hour values for New York are shown in Table 5.5.

Review and Responsibility

Within New York's *State Administrative Procedure Act* (2010c), an institution's faculty and academic officers are responsible for all aspects of curricula, which includes determining credit hour value. P20 directed the interview to *Determining Time on Task in Online Education* (2010a). This policy section stated responsibility for who determines time on task. Specific duties and responsibility were assigned to the institution with explicit direction to faculty member who develops and/or teaches an online course.

New York system required that institutions offering online education must register courses and programs with the state. The application asked about term's length, instructional time, and if the online course/program was the same length as an equivalent classroom program (Office of College and University Education, 2008). P20 indicated that the state must be assured that the online instruction meets the same "academic standards and requirements" as any other course regardless of the learning platform. This would include learning design, structure, objectives, and assessments. Also, regular program evaluation must be conducted to "evaluate the effectiveness of the distance learning" and that "the program results in learning outcomes appropriate to the rigor and breadth of the college degree or certificate awarded" (Office of College and University Education, 2008, pp. 1, 3).

Translation Policy

As presented, New York required that institutions offering online education must register and have course/program application approved. The provider must provide

Table 5.5

New York Credit Hour Values

	Time/Week			Time/Semester			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Non-contract credit 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Non-contract credit course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from *State Administrative Procedure Act*, 8 N.Y.C.C.R.R. §II.A.52.2(c)(4) (2010.).

sufficient information that indicated to the state that all academic expectations and standards found in the classroom are met for online courses and programs (Office of College and University Education, 2008, 2010d). Additionally, New York provided several documents that may be used to determine sound academic practices: (a) *Principles of Good Practice* (Office of College and University Education, 2011b), (b) *Organizational Commitment* (Office of College and University Education, 2009b), (c) *Learning Design* (2010b), (d) *Learner Support* (Office of College and University Education, 2010b), (e) *Outcomes and Assessment* (Office of College and University Education, 2009c), (f) *Program Evaluation* (Office of College and University Education, 2009e), and (g) *Examples of Good Practice* (Office of College and University Education, 2011a). These sources were found similar to the other "good practices" discussed in other sections of this document. As indicated by P20, *Principles of Good Practice* and *Learning Design* resources provided guidelines for online educational offerings so the learning format would have the same "quality, integrity, and consistency" (¶4) as a campus classroom. The course design included the same "academic standards and requirements" (¶6). Lastly, faculty were responsible for the curricula, outcomes, assessment, and quality of course work. When completed, course outcomes should be comparable to an on-campus course (Office of College and University Education, 2009c, 2009e).

P20 discussed how New York addressed assigning credit value to online education. New York's policy, *Determining Time on Task in Online Education* (Office of College and University Education, 2010a) stated,

> Time on task was the total learning time spent by a student in a college course, including instructional time as well as time spent studying and completing course assignments (e.g., reading, research, writing, individual and group projects.) Regardless of the delivery method or the particular learning activities employed, the amount of learning time in any college course should meet the requirements of Commissioner's Regulation Section 50.1 (o), a total of 45 hours for one semester credit (in conventional classroom education this breaks down into 15 hours of instruction plus 30 hours of student work/study out of class.) [See "Credit Hour Definition" section.] (¶13).

P20 pointed out the last paragraph of the policy by quoting, "Theoretically, one should be able to measure any course, regardless of delivery method, by the description of content covered" (¶27). The policy was based on "calculating how much time a student doing satisfactory work would take to complete the work of the course" (¶14). The counted time should be comparable to the time a student would typically spend in a course based in a classroom. Activities that should not be considered in the calculation include, "time spent downloading or uploading documents, troubleshooting technical problems, or in chat rooms (unless on course assignments such as group projects) should not be counted" (¶21). Learning activities that should be considered when calculating learning time were reading, course assigned online discussions, research, and completing assignments. The policy indicated that the developers or instructors should determine the task on time. Any other persons attempting to do so would have had difficulty since those persons may not have fully understand the "many different levels of breadth and depth in the treatment of that content" (¶27), and thus, not able to properly assign time values.

New York Summary

New York attempted to manage credit hours for asynchronous online education through its credit hour definition and through another policy entitled, *Determining Time on Task in Online Education* (Office of College and University Education, 2010a). The credit hour formula used by New York follows the traditional Carnegie Unit format: 15 sessions of 50 minutes (instructional hour) plus 30 or more student preparatory hours. The definition indicated that the "basic measure shall be adjusted proportionately to translate the value of other academic calendars and formats of study" (State Administrative Procedure Act, 2010c). This was similar to other state practices. New York had another factor similar to others in that the state provided *Principles of Good Practice* (Office of College and University Education, 2009a, 2009b, 2009c, 2009d, 2009e, 2010a, 2010b, 2010c, 2011a, 2011b) for institutions offering online education. However, the guidelines provided by the state elaborated more details about assigning time to course work.

Guidelines to determine time for learning activities were unique to New York. This policy provided examples of what was considered learning activities. Also, the procedure further indicated that faculty and curriculum developers were qualified to know the nuances of the materials and structure of the course to define the expected total amount of time a student will take to complete course work. Based on that judgment, a credit hour value may be established based on the aforementioned credit hour definition.

Public System: North Carolina

The higher education organizational structure within North Carolina was similar to California's state higher education system by having a state university system for the

higher education public institutions. Based on IPEDS data, North Carolina was chosen for this project and found eighth on the list of top ten state systems offering online distance education. Student enrollment for the 2008-2009 academic year provided by IPEDS data was 214,536 enrollees (National Center for Education Statistics, 2010); see Chapter 3 for specific details.

Credit Hour Definition

North Carolina's higher education system did not have a specific policy defining a credit hour. The lack of an explicit definition was also mentioned by P22 during the interview. The system had, however, a policy that defined an academic calendar (The University of North Carolina Academic Calendar, 2007). The policy provided the parameters of class time, which were similar to credit hour definitions. Indirectly, the credit hour was defined for system institutions. Within the information, all North Carolina campuses were instructed to

> Ensure that every course offered for academic credit adheres to the standard of a minimum of 750 scheduled minutes of instructional time or the equivalent per credit hour. The time may include required examination periods, but may not include study days. In setting the academic calendar for each semester, campuses may set holiday periods, study days, and final examinations appropriate to accommodate the scheduled classes. In no case may a campus set a calendar that has optional final examinations if the time was considered a part of the required minimum class time. (The University of North Carolina Academic Calendar, 400 The UNC Policy Manual §1.6, 2007)

The definition provided was similar to other credit hour instructional time definitions. North Carolina did not indicate any extra time for non-instructional learning such as laboratory work and internship. Thus, using North Carolina's 750 minutes per credit as the basis, a credit hour would be as shown in Table 5.6: 750 minutes divided by traditional 50 minutes of instruction (one traditional instructional hour) for 15 sessions (one semester). The result was 15 instructional hours of course work per credit hour.

P22 indicated that the system relied on "campus disciplinary curricular committee structures" to set standards and set credit hour values. Also discussed was a review process that occurred on each campus, and as needed, on the system level. The broader system review was normally concerned with program level and significant changes. P22 stated about credit hour assignment, "the campus curriculum committees and the content area faculty determine how much content should be within a three credit hour course…or whether the course should be a three or a one or a two credit hour course." Also stated during the interview by P22, "We do not sit down and say, 'this was only three hours or two hours.' That was a campus driven process."

Responsibility

During the interview, P22 emphasized that the local faculty and curriculum committees and officers had responsibility for credit hour values and the associated content. The chief academic officer on each campus had the ultimate responsibility. During our discussion, P22 indicated that campuses based online education courses on matching face-to-face courses and programs. Therefore, the online version of any course was parallel to an on-campus course, resulting in the same learning outcomes and

Table 5.6

North Carolina Credit Hour Values

	Time/Week			Time/Semester			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Academic credit 1 credit	1 hr			15 hrs			15 hrs
Academic credit course 3 credits	3 hrs			45 hrs			45 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from "The University of North Carolina Academic Calendar," 400 *The UNC Policy Manual* §1.6 (2007, July 1, 2007).

covering the same or similar materials or content. It was then the responsibility of faculty and departments to ensure that online courses maintained the same quality as on-campus counterparts.

Translation Policy

According to P22, the North Carolina system tried "to maintain that [online] courses are equivalent in quality and expected learning outcomes as courses offered in a residential format." It was mentioned, again, that system campuses based asynchronous online courses as parallel to on-campus courses. Within the UNC policy manual (2009) were detailed guidelines for alternative education modalities including online education. Pertaining to credit hour values,

> The academic standards and quality of course and degree-related distance education shall be consistent with and comparable to the academic standards and quality of regular, on-campus instructional activity. The application and maintenance of academic standards are the responsibility of the academic unit and campus offering the instruction. (Guidelines for Alternative, Online, or Distance Education Delivery of Approved Degree Programs, 400 U. N. C. P. M. §1.1.2[G], 2009)

Other than this standard, no other guidelines addressing credit hour values or translation of online courses for credit hour values were found.

However, a notable recurrence within the policy manual was the placement of responsibility on local institutions and faculty. Examples found in data indicated that (a) the campus and academic departments "are responsible for the development, delivery, regular assessment, and accreditation" (p. 2); (b) institutions' departments and Office of

Academic Affairs "are responsible for ensuring that they follow COC [Commission on Colleges, Southern Association of Colleges and Schools] criteria and procedures with respect to any distance education activities" (p. 2); and (c) online education course development and delivery were "institutional responsibilities" (p. 2). P22 also indicated that each academic department and institutions controlled courses, content, and determination of credit hour values.

North Carolina Summary

North Carolina's credit hour definition was not clearly stated as other institutions. However, within their documentation, the credit hour was based on 750 minutes of instruction per credit per semester. Applying credit hour basic factors, the time allotment equated to fifteen 50 minutes instructional hours; i.e., one credit hour. Determination of credit hour values, course content, and learning outcomes fell heavily on faculty, academic departments, and the academic officers of each institution. Even though North Carolina did have a policy addressing alternative and distance education courses, the regulation did not specifically address translation of online education into credit hour values.

Public System: Ohio

The Ohio Board of Regents governs Ohio's higher education system (Ohio Board of Regents, 2010a). Based on IPEDS data collected, Ohio's system was chosen as one of the top ten state systems offering online distance education (see Chapter 3 for specific details). Ohio ranked fifth on the top ten list with 296,166 student enrollees for the 2008-2009 academic year (National Center for Education Statistics, 2010).

Credit Hour Definition

P14 defined a credit hour as, "750 minutes of some sort of formalized instruction and double that so that 1,500 minutes of expected student homework, follow-up work…in whatever mode that the faculty would require student follow-up per credit hour." P14's definition was confirmed within *Directive 2010-016: Definition of Semester Credit Hour and Length of Semester Term* (Ohio Board of Regents, 2010d):

> One semester credit hour will be awarded for a minimum of 750 minutes of formalized instruction that typically requires students to work at out-of-class assignments an average of twice the amount of time as the amount of formalized instruction (1,500 minutes). It was acknowledged that formalized instruction may take place in a variety of modes.
>
> While awarding semester credit hours typically occurs for instruction delivered in accordance with an institution's standard semester calendar, it may also occur for instruction that may not follow the typical pattern of an institution's standard semester calendar as long as the criteria for awarding such credit was met. (p. 2)

To further define learning associated with credit hours, the *Directive* also stated that formalized instruction, regardless of the educational modality, was "instruction for which the instructor bears the primary responsibility for delivery" (p. 2). Basic credit hour information is shown in Table 5.7 with Appendix V noting details beyond the basic credit hour. A semester was also defined as 15-17 calendar weeks of instructional time with a minimum of 30 weeks being an academic year. As indicated in the directive, credit hours for the many other format types of learning "may be calculated differently" (p. 2):

Table 5.7

Ohio Credit Hour Values

	Time/Week			Time/Semester			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Classroom 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Classroom course 3 credit	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from Ohio Board of Regents. (2010). *Directive 2010-016: Definition of Semester Credit Hour and Length of Semester Term*. Columbus, OH: Ohio Board of Regents. Retrieved September 21, 2010, from http://regents.ohio.gov/actions/documents/2010/Dir2010-016.pdf.

"(a) laboratory instruction, (b) clinical laboratory instruction, (c) directed practice experience, (d) practicum experience, (e) cooperative work experience, (f) field experience, (g) observation experience, (h) seminar, (i) miscellaneous, and (j) studio experience" (pp. 2-3). Within data from other systems, similar activities were included as extra learning time. Extra learning activities for Ohio were also redefined in the Ohio *Directive*:

1. Laboratory instruction – "one hour of credit shall be awarded for a total of 2,250 minutes" (p. 12).
2. Laboratory instruction with student work – "one hour of credit shall be awarded for a total of 1,500 minutes laboratory instruction" (p. 12) plus 750 minutes student work (p. 12).
3. Clinical laboratory instruction and instruction with student work– "Credit hours for the clinical laboratory experience will be awarded on the same basis as laboratory instruction" (p. 12).
4. Directed practice experience – "4,500 minutes of directed practice instructional time" (p. 13).
5. Practicum experience- "6,300 minutes practicum instructional time" (p. 13) (Students enrolled in practicums are required to also be enrolled in an on-campus seminar that coincides with practicum. The design was that the practicum augments the seminar, resulting in something similar to instructional time plus student "work". Practicum time allotment did not match exactly the traditional instructional hour/credit hour formula. Ohio's policy was based on a maximum of nine credit hours for a semester. Applying

the traditional constructs resulted in 46.67 minutes instead of 50 minutes per instructional hour. Therefore, figures presented in Appendix V will not follow traditional results as instructional hours are presented relative to traditional 50 minutes as instructional hour. Since practicum learning coincided with seminar learning, the figures shown combined both to present total learning time.).

6. Cooperative work experience – "9,000 minutes of cooperative work experience instructional time" (p. 13) (Cooperative work was similar to practicum courses in that minutes do not evenly equate to traditional 50 minutes per instruction hour, and was also presented as a maximum of nine credit hours. The base of 66.67 minutes was considered extra work time since each student was required to enroll in corresponding on-campus seminar.).
7. Field experience – "10,800 minutes field experience instructional time" (p. 14) (Instruction time shown In Appendix V followed formatting of previous two learning activities. Field experience has a base of 80 minutes resulting in 1.6 relative traditional instructional hours. Field experience does not require a corresponding on-campus course.].
8. Observation experience – "13,500 minutes observation instructional time" (p. 14) (Observation experience time shown in Appendix V followed formatting as previous learning activities. Observation experience had a base of 900 minutes resulting in 18 relative traditional instructional hours. Observation experience did not require a corresponding on-campus course.).

9. Seminar – “Credit was awarded for seminar how's on the same basis as that for the classroom hour” (p. 14).
10. Miscellaneous applications courses – “6,300 minutes of instructional time” (p. 15) (Miscellaneous applications courses were similar to practicum courses described previously. The base of 66.7 minutes will be considered extra work time since these types of courses are “subsequent to sessions of individualized instruction” (p. 15). The corresponding figures shown in Appendix V are 0.9 traditional instructional hour.).
11. Studio course – “2,250 minutes instructional time” (p. 15) (Following the format used with prior learning activities, a studio course 150 minutes per one traditional instructional hour].
12. Studio course with student work – “one hour of credit shall be awarded for a total of 1,500 minutes studio instruction” (p. 15) plus 750 minutes student work (p. 15).

Responsibility

P14 indicated that the credit hour definitions allowed flexibility so campuses had the ability to provide learning most effectively to the need. As discussed previously, the responsibility fell on local campuses to discern course content, learning outcomes, and number of credit hours. P14 discussed the established articulation agreements and guidelines; referred to Credit Transfer: Ohio Board of Regents (Ohio Board of Regents, 2010c) and *Articulation and Transfer Glossary* (Ohio Board of Regents, 2010b). Students were having difficulty transferring between institutions intra-state and inter-state due to a wide range of standards for classes. The Ohio system worked to standardize expectations

and learning outcomes. The result was articulation agreements that made it easier for students to transfer.

Institutions were charged with the full responsibility of curricula and programs in *Directive 2010-016: Definition of Semester Credit Hour and Length of Semester Term* (Ohio Board of Regents, 2010d) The *Directive* was issued in order to facilitate more flexibility for institutions offering non-traditional course work, and to enhance consistency between Ohio's institutions. Also, the *Directive* established that "a semester hour will mean the same throughout" (Ohio Board of Regents, 2010d, p. 5) the system. "Ultimately, the responsibility for protecting the academic integrity of curricula, programs, and schedules rests upon the judgment of the chief academic officers of Ohio's colleges and universities within The University System of Ohio" (Ohio Board of Regents, 2010d, p. 5).

Translation Policy

As presented in the previous credit hour definition section, Ohio had an extensive set of guidelines for how much learning time was involved for credit hour assignment to various learning modalities. However, no guidance was provided addressing translation of online education into credit hour values. According to P14, "there was no different calculation for online [education]. A credit hour was a credit hour, and the expectation was that people follow it" regardless of the learning format. Presented prior this section, the ultimate responsibility rested with each institution's chief academic officer for academic quality, integrity, course content, learning outcomes, and credit hour assigned values regardless of the educational format used.

Ohio Summary

The basic credit hour definition for Ohio followed the traditional format of 50 minutes equating to an instructional hour with an additional two hours of student work. When the traditional one instructional hour plus two student work hours was factored by 15 weeks of a semester the result was 15 instructional hours and 30 student work hours. The total of 45 hours of learning per credit hour was the outcome. Ohio provided detailed guidelines on how to associate credit hours for many types of learning. From those standards, learning time outside of the normal classroom ranged from 24 hours for one credit of field experience to 270 observational hours for one credit.

The expectation within Ohio's higher education system was that credit hour production was followed regardless of the learning modality. The guidelines presented were thorough for many learning activities. However, there were no specific regulations or guidelines that instruct institutions on converting asynchronous online education into credit hour values.

Public System: Pennsylvania

Within the Commonwealth of Pennsylvania, the State Board of Education, Office of Postsecondary and Higher Education, had the authority to oversee Pennsylvania's higher education institutions (P26; Pennsylvania Department of Education, 2011). Pennsylvania's system was chosen for this project based on IPEDS data collected to determine the top ten state systems offering online distance education; see Chapter 3 for specific details. Ranking as the sixth top system, IPEDS data indicated 271,042 student enrollees for 2008-2009 academic year.

Credit Hour Definition

Pennsylvania did provide a credit hour definition for its institutions. P26 provided responses referencing Pennsylvania State Board of Education's policies and the Commonwealth's statutes. Pennsylvania defined a semester credit hour as representing "a unit of curricular material that normally can be taught in a minimum of 14 hours of classroom instruction, plus appropriate outside preparation or the equivalent as determined by the faculty" (State Board of Education General Provisions, 2006). Also a factor in determining credit values understood time involved for a semester or academic term as:

> (a) An academic year shall consist of instructional sessions for a minimum of 28 weeks exclusive of registration, examinations and holidays. (b) An innovative calendar arrangement of less than 28 weeks shall be permitted provided that credits and degrees awarded under the arrangement satisfy the minimum requirements as specified in § 31.21 (relating to curricula). (State Board of Education General Provisions, 1982)

Classroom learning per credit was noted as 42 hours for a semester, which was three hours less than traditional credit hours per semester. As displayed in Table 5.8 this definition does not provide exact numbers leaving a variable based on instructors' choices.

The statute stated more specifically elsewhere that "60 semester credit hours…[have a] minimum of 1,500 clock hours" (State Board of Education General Provisions, 2006). Assuming that a clock hour was 50 minutes for one instructional credit hour and 14 week semesters, the result was 1.8 instructional hours per credit. There was

Table 5.8

Pennsylvania Credit Hour Values (1:14)

	Time/Week			Time/Semester (14 weeks)			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Instructional hour 1 credit	1 hr	X		14 hrs	14X hrs		14(1+X) hrs
Instructional course 3 credits	3 hrs	3X		42 hrs	14(3X)		14(3+3X) hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from State Board of Education General Provisions, 022 P.C. §31.21.Curricula (2006).

no mention of outside class work with this specific credit-time framework. Table 5.8 displays credit values as related to traditional credit hour values. Educational time shown in Table 5.9 (25.2 hours per credit) was significantly different from instructional time displayed in Table 5.8 (14 hours plus 14X hours per credit). Also, data displayed in Table 5.9 (25.2 hours per credit) was dissimilar to traditional credit hours (45 hours per credit).

In another Pennsylvania code, *The Private Licensed School Act* (2005), a credit hour was defined differently than other credit hours found within Pennsylvania documentation. *The Private Licensed School Act* credit hour was defined as

> A unit of curricular material which normally can be taught in a minimum of 14 clock hours of instruction. For laboratory instruction, a credit hour represents a minimum of 28 clock hours. For shop instruction and practicum experiences, including externship/internship experiences, a credit hour represents a minimum of 42 clock hours.

Within the same code, a clock hour was explained as "a minimum of 50 minutes of instruction" (The Private Licensed School Act, 2005). Assuming 14 weeks per semester and one clock hour equals the same as a traditional instructional hour. Displayed in Table 5.10 are basic credit hour values for this regulation. Appendix W presents more details than indicted in Table 5.10.

Pennsylvania's Office of Postsecondary and Higher Education issued a policy specifically addressing curriculum and credit hour values "to ensure minimum standards of quality" (Pennsylvania Department of Education, ¶1, 2008). Within the policy, "one college semester credit was defined as 14 hours of classroom instruction….A three-credit semester based course, for example then, would need to meet for 42 hours of rigorous

Table 5.9

Pennsylvania Credit Hour Values (60 credits:1,500 clock hours)

	Time/Week			Time/Semester (14 weeks)			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Instructional hour 1 credit	1.8 hr			25.2 hrs			25.2 hrs
Instructional hour course 3 credits	5.4 hrs			75.6 hrs			78.60 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from State Board of Education General Provisions, 022 P.C. §31.21.Curricula (2006).

Table 5.10

Pennsylvania Credit Hour Values (Private Licensed Schools)

	Time/Week			Time/Semester (14 weeks)			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Instruction 1 credit	1 hr			14 hrs			14 hrs
Instruction course 3 credits	3 hrs			42 hrs			42 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from *The Private Licensed Schools Act*, 022 P.C. §73.1.Definitions (2005).

college classroom instruction over the semester" (¶5). This definition was similar to the time displayed in Table 5.8 for an instruction course.

There appeared to be a discrepancy within the same policy just presented between the credit hour definition—one credit equals 14 classroom instruction hours, and the time found in paragraph six of the policy (Pennsylvania Department of Education, 2008) as well as the parameters discussed earlier in this section. The policy stated that,

> Courses must be scheduled for the correct number of hours per credit awarded. For example, even if a 15-minute break was taken, a three hour seminar should be scheduled for a full three hours from 2pm to 5pm, not 2pm to 4:45pm. (¶6)

Here, the instructional hour must be scheduled as a full clock hour (60 minutes). Also, the example provided may indicate that the time from 2:00 p.m. to 4:45 p.m. was actual instructional time. In this case, an instruction course of three credit hours translated into 55 minutes per credit hour.

Responsibility

The documentation found for addressing the research did not contain any specific information showing responsibility for credit hours. The *Curricular Credit Policy: Ensuring Quality and Transferability* (Pennsylvania Department of Education, 2008) policy indicated that an institution's administration, registrar, and faculty "should be aware of these regulatory requirements, [and that] adherence to these regulations should enhance the quality and rigor of" (¶12) Pennsylvania's higher education courses.

According to *Office of Postsecondary and Higher Education* web page (Pennsylvania Department of Education, 2011), the duties of the office included:

> Evaluation of program approval requests for two-year, four-year, graduate and professional degrees; works with organizations seeking approval as degree-granting colleges, universities and seminaries to effect such approval… [consulting] with the State Board of Education on the development of regulations to assure quality postsecondary and higher education programs. (¶1)

Documentation did not provide any other regulatory duties, leaving the primary responsibility of curricula and credit hour values to local faculty and institutional administration.

Translation Policy

When asked about translating online education into credit hour values, P26 provided the text from *Curricular Credit Policy: Ensuring Quality and Transferability* (Pennsylvania Department of Education, 2008). The policy stated that it allowed "for 'innovative calendar arrangements'" (¶8), enabling institutions to offer course work on calendars that did not match the defined academic calendar (described previous a previous section). In doing so, the institution had to adjust the total hours of instruction so "the total number of hours of classroom instruction required for the amount of credit awarded the course would not change" (¶8). In "determining activities that are 'the equivalent' of classroom instruction" (¶9) the policy indicated that faculty would agree on "what online activities constitutes the *equivalent* [italics in original] of classroom instruction for uniform implementation across the institution" (¶9).

The policy did provide guidelines on what should be considered in determining classroom equivalents:

> To identify high quality curricular content that was the equivalent of classroom instruction, the following should be considered. The activities that are the equivalent of classroom instruction *would best* [italics in original] be:
>
> ⇒ directly related to the objectives of the course/program,
>
> ⇒ be measurable for grading purposes,
>
> ⇒ have the direct oversight or supervision of the faculty member teaching the course, and
>
> ⇒ in some form be the equivalent of an activity conducted in the classroom.
>
> The equivalent content should *not* [italics in original] be:
>
> ⇒ homework assignments
>
> ⇒ 'time spent', that is, a calculation based on the amount of time the student spends accomplishing a task. (¶10-11)

These guidelines aligned online learning with classroom learning: objectives, outcomes, and assessments. Also, the policy removed the counting outside student work such as homework and time on task from consideration. Faculty, thus, were responsible for content and discerning credit hour values comparable to a traditional classroom.

The state's *Curricula* (State Board of Education General Provision, 2006) policy (discussed above) indicated that institutions were to assure academic integrity and to provide for distance education students the same "academic and student services" of on-campus courses and programs. This included assurance "of student work and provide opportunity for student assessment….and conform to generally accepted academic

practices for delivery of instruction through distance education" (State Board of Education General Provision, 2006).

Pennsylvania Summary

Pennsylvania's credit hour definitions provided a diversity of understanding and application for credit hour values. Definitions also varied from the traditional understanding in that a semester was 14 weeks, and depending on which type of credit hour definition used, varied significantly from traditional learning time. Expectations for online education were similar to other parameters found in other states and accrediting agencies: objectives, assessments, faculty involvement, and comparable to on-campus learning. Like other states, Pennsylvania did not have a specific practice or policy addressing online education translation into credit hour policies. The guidelines provided were based on judgments made by faculty and administration.

Public System: Texas

The Texas Higher Education Coordinating Board oversaw public higher education within Texas (P25; Higher Education Coordinating Act of 1965, 1971). This system was chosen for this project based on IPEDS information, determining it was one of the top ten state systems offering online distance education; see Chapter 3 for specific details. Texas ranked as the second largest state system by IPEDS data enrollment for 2008-2009 academic year with 558,336 student enrollees.

Credit Hour Definition

Texas defined credit hour in two places within state education rulings. P25 confirmed the two definitions. The first definition discussed was found in regulations concerning financing. P25 indicated that one credit hour was "instruction consisting of 60

minutes, of which 50 minutes must be directed instruction over a 15 week period in a semester." P25 also discussed the second definition stating that it was provided as "an alternative way of considering the credit hour because of alternative delivery methods." P25 referred to the ruling, which read:

> (a) Traditionally-delivered three-semester-credit-hour courses should contain 15 weeks of instruction (45 contact hours) plus a week for final examinations so that such a course contains 45 to 48 contact hours depending on whether there was a final exam. (b) Every college course was assumed to involve a significant amount of non-contact hour time for out-of-class student learning and reflection. (Minimum Length of Courses and Limitation on the Amount of Credit that a Student May Earn in a Given Time Period, 2003)

This definition was similar to a traditional credit hour when coupled with semester credit hour definition found in another regulation: "a unit of measure of instruction consisting of 60 minutes, of which 50 minutes must be direct instruction over a 15-week period in a semester system" (Definitions, 2010). The variance within Texas rules was the lack of a measurable time when referring to "out-of-class student learning and reflection." Instead, Texas indicated that the assumption for student work separate from instructional time was a "significant amount" (see Table 5.11).

Courses that were not offered within a traditional time frame were permitted. Such courses required the same amount of contact hours and student work as traditional courses. Also, an institutional faculty review process was required for non-traditional education to ensure that a course had "learning outcomes and determines that the course does, in fact, have equivalent learning outcomes to an equivalent, traditionally delivered

Table 5.11

Texas Credit Hour Values

	Time/Week			Time/Semester			
	Class[a]	Prep[b]	Extra[c]	Class[a]	Prep[b]	Extra[c]	Total
Instructional course 1 credit	1 hr	X hrs		15 hrs	15X hrs		15(1+X) hrs
Instructional course 3 credits	3 hrs	3X hrs		45 hrs	45X hrs		45 hrs

Note. [a]Considered traditional instructional time or classroom learning when instructor and student were directly interacting at a designated time and place. [b]Preparation time student was expected to conduct outside classroom learning in preparation for course. [c]Extra time was assigned in addition to class and preparation work. Most commonly associated with laboratory time. Created from *Minimum Length of Courses and Limitation on the Amount of Credit that a Student May Earn in a Given Time Period*, 19.1 T.A.C. §4.A.6 (2003. May 27, 2003).

course" (Minimum Length of Courses and Limitation on the Amount of Credit that a Student May Earn in a Given Time Period, 2003).

Responsibility

P25 noted that their office had witnessed an increase in online education. P25 was not aware of any programs offered that did not have an equivalent on-campus program. Thus, the online version carried over the objectives, content, and other course relevant standards. The Texas Higher Education Coordinating Board, according to P25, reviewed institutional programs but not individual courses. The agency's *Guide For Incorporating The Principles Of Good Practice Into Electronically-Based Courses* (Texas Higher Education Coordinating Board, 2002) was discussed. Institutions were noted to hold the responsibility to review online courses and programs and to "certify continued compliance" (p. 5) with the principles of the document and with any other regulatory and accreditation standards. Texas' principles were similar to those discussed previously. In that similar fashion, curriculum and instruction must have "learning outcomes appropriate to the rigor and breadth" (p. 5) of the course and degree. As presented by P25, the guidelines indicated that "academic standards for all programs or courses offered electronically will be the same as those for programs or courses delivered by other means at the institution where the program or course originates" (p. 7). P25 continued by discussing how student learning must be comparable to courses found in traditional settings. Lastly, the guidelines ended by requiring faculty, department, and institutional signatures indicating thorough review and acceptance of all elements of the online course. It was from that point that a "distance education advisory committee" (P25) reviewed, evaluated, and determined acceptance of the institution's proposal.

Translation Policy

Texas did address online credit hour values. These were in the form of requiring strict evaluation of programs and careful reviews by faculty, administration, and an online advisory committee. Texas required that online education met the same standards as traditional learning (P25; Texas Higher Education Coordinating Board, 2002). Standards included learning outcomes, content, and rigor appropriate to the course and degree. However, Texas regulations and guidelines did not specifically address translating online education into credit hour values. The expectation was to consider an equivalent value as that of traditional on-campus education. Therefore, what was decided for the traditional course was applied to the comparable online course.

Texas Summary

Texas defined its credit hour similarly to the traditional format in that one hour of instruction for 15 week semester equates to one credit. However, Texas did not include values for what other states and agencies consider as student work or extra work. Texas standards stated instead that, "every college course was assumed to involve a significant amount of non-contact hour time for out-of-class student learning and reflection" (Minimum Length of Courses and Limitation on the Amount of Credit That a Student May Earn in a Given Time Period, 2003). The amount of student and extra course work expectations varied. Texas also required its institutions and faculty to carefully consider online work so that it met the same expectations as traditional courses. Therefore, assigning credit values was a matter of transferring what was decided for a campus-based course to the online version. P25 collaborate document findings that an advisory committee existed just for online education. Part of this group's duties included

evaluation of proposed programs and courses as well as ongoing online education work. The final result for translation of online education into credit hours was left for professional judgment.

Public System: Virginia

The State Council of Higher Education for Virginia oversaw postsecondary education for the commonwealth (State Council of Higher Education for Virginia, 2010). The Virginia system was chosen for this project based on data gathered from IPEDS, which determined that Virginia was one of the top ten states offering online distance education; see Chapter 3 for specific details. With a student enrollment of 206,000 for 2008-2009 academic year, Virginia ranked tenth in the project list.

Credit Definition

Virginia defined a credit hour as, "a unit of measure representing an hour (50 minutes) of instruction over a 15-week period in a semester or trimester system (State Council of Higher Education for Virginia, 2011). Associated terms such as (a) credit—"recognition of attendance or performance in an instructional activity (course or program) that can be applied by a recipient toward the requirements for a degree, diploma, certificate, or other formal award;" (b) contact hour—"a unit of measure that represents an hour of scheduled instruction given to students. Also referred to as clock hour;" and (c) Carnegie Unit—"one year of study or the equivalent in a secondary school subject" (State Council of Higher Education for Virginia, 2011) existed within documentation. Even though a Carnegie Unit was traditionally defined as a credit hour—50 minutes of instruction over the course of a semester—Virginia did not directly associate the meanings of credit hour and Carnegie Unit together.

In another Virginia document the academic credit was described slightly different than prior definition.

> "Academic credit" means the measure of the total time commitment an average student was expected to devote to learning per week of study. Generally, one unit of credit represents a total of three hours per week of in-class and out-of-class work (Carnegie Unit of Credit). In this context, an hour was defined as 50 minutes. Emerging delivery methodologies may necessitate determining a unit of undergraduate or graduate credit with nontime-based methods. These courses shall use demonstration of competency, demonstration of proficiency, or fulfillment of learning outcomes to ensure these courses are equivalent to traditionally delivered courses. (Regulations Governing Certification of Certain Institutions to Confer Degrees, Diplomas, and Certificates, 2006)

In this definition, instruction was associated with traditional time of 50 minutes for the meaning of a credit hour. Virginia differentiated a Carnegie Unit, however, to incorporate the 50 instructional minutes (one hour) plus two hours of extra student work. Traditionally, the Carnegie Unit and credit hour are not distinguished. Virginia credit hour definition of academic credit also allowed for "nontime-based" education such as asynchronous online learning. This point will be discussed in a later section.

In the same regulation, a "'clock (or contact) hour' means a minimum of 50 minutes of supervised or directed instruction and appropriate breaks" (Regulations Governing Certification of Certain Institutions to Confer Degrees, Diplomas, and Certificates, 2006), which was that of a traditional credit hour. Additionally, a "'credit' means (i) the quantitative measurement assigned to a course generally stated in semester

hours…or clock hours or (ii) the recognition awarded upon successful completion of coursework." This associated all the terms presented and indicated that a credit was something that could be measurable. The regulation also specifically defined a credit hour. This was slightly varied from the academic credit discussed previously. The credit hour for Virginia was described as:

> "Credit hour" means a unit by which a school may measure its coursework. The number of credit hours assigned to a traditionally delivered course was usually defined by a combination of the number of hours per week in class, the number of hours per week in a laboratory, and/or the number of hours devoted to externship multiplied by the number of hours in the term. One unit of credit was usually equivalent to, at a minimum, one hour of classroom study and outside preparation, two hours of laboratory experience, or three hours of internship or practicum, or a combination of the three multiplied by the number of weeks in the term. Emerging delivery methodologies may necessitate determining a unit of undergraduate or graduate credit with nontime-based methods. These courses shall use demonstration of competency, demonstration of proficiency, or fulfillment of learning outcomes to ensure these courses are equivalent to traditionally delivered courses. (Regulations Governing Certification of Certain Institutions to Confer Degrees, Diplomas, and Certificates, 2006)

As presented in the definition, Virginia addressed both traditional and non-traditional ("nontime-based") education. As noted previously, Virginia does not include additional time for student work with an instructional class setting. Instead, the extra hours were not measured and devoted to laboratory work and the like.

Responsibility

In a 2003, Virginia's State Council of Higher Education reported the difficulties of offering off-campus courses. The document contained an historical synopsis of distance education within Virginia higher education. The report indicated that credited courses were to be treated the same as traditional courses to assure the same caliber of education (State Council of Higher Education for Virginia, 2003). Other documentation placed the state council as the party with responsibility to "provide oversight" (Regulations Governing Certification of Certain Institutions to Confer Degrees, Diplomas, and Certificates, 2006) of institutions within its jurisdiction. Additional duties included reviews and inspections of institutional offerings and activities, and monitoring accreditation. An institution's responsibility was to ensure that any "course, program, curriculum and instruction must be of quality, content and length to adequately achieve the state objective" (Regulations Governing Certification of Certain Institutions to Confer Degrees, Diplomas, and Certificates, 2006). In addition to the above, institutions were regulated to "certify that…all instructional courses for degree credit require a minimum of 15 contact hours for each semester credit hour…or the equivalent, and an expectation for additional assignments beyond scheduled instructional activities" (Regulations Governing Certification of Certain Institutions to Confer Degrees, Diplomas, and Certificates, 2006). Qualified faculty and administrative persons were required to ensure that curriculum and student learning were maintained for quality higher education. An institution must also have documented procedures for developing and ongoing maintenance of curriculum and programs, and include explanation for evaluation and

assessing effectiveness. As already stated, the state council had the duty to review and evaluate institutions for compliance and quality of their courses and programs.

Translation Policy

As discussed previously in the credit hour definition section, Virginia did provide regulation for what was termed, "nontime-based methods" relational to credit hour values of such courses. The regulation stated:

> Emerging delivery methodologies may necessitate determining a unit of undergraduate or graduate credit with nontime-based methods. These courses shall use demonstration of competency, demonstration of proficiency, or fulfillment of learning outcomes to ensure these courses are equivalent to traditionally delivered courses. (Regulations Governing Certification of Certain Institutions to Confer Degrees, Diplomas, and Certificates, 2006)

Within this regulation, online education courses were to use outcomes, proficiencies, and assessments of students relationally to course outcomes. The policy referred to relating courses based on alternative methods to courses that were traditionally based in classroom instruction. Therefore, it appeared that online courses would be assigned equivalent traditional course credits as long learning outcomes correlate.

Virginia Summary

The basics of Virginia's credit hour definition were based on the 50 minute instructional hour for the course of a semester. In one document, a credit hour was not associated with the Carnegie Unit, which was the conventional base of a credit hour. However, in another document academic credit and Carnegie Unit were related and used the established 50 minute instructional hour plus two additional hours of student work to

equate to one academic credit. Virginia then provided explanation of how online education may assign credit hour values. This was determined by virtual courses assessing students' fulfillment of course learning objectives, which were those of a customary classroom-based education.

Analysis

Each of the systems examined provided their own interpretation of credit hour values and the learning time involved per unit. Many similarities existed between the systems. However, each system had its own nuances that provided another level of comparison. With one exception, all the systems had a documented definition of a credit hour. The systems with documented definitions were similar to regional and national credit hour definition and practices.

An analysis of systems findings are discussed in the following sections. The three major components—credit hour definition, responsibility, and translation policy—from each system are used to provide a response to Research Question 2: What methods do system level policies set forth for determining the translation of asynchronous online class time into credit hours? Each of the factors was analyzed separately. The end of the analysis will then connect all elements for a complete understanding of credit hour use with asynchronous online education.

Credit Hour Definitions

From previous discussion within this chapter and prior chapters, a credit hour was associated with or defined as the amount of time involved in learning. Variance, however, begins to occur from that common understanding. Definitions may or may not include student preparation time, instructor involvement, and extra time, beyond the norm, for

course work deemed needed. Systems defined and used credit hours similarly to regional and national standards. As with findings discussed in Chapter 4, the systems' definition and use of credit hour was not significantly different than when the unit was introduced over a century ago.

With or Without Definition. All the systems had similarities in their credit hour understanding. However, California did not have a documented credit hour definition. Displayed in Table 5.12 are documented definitions and translation policies by system. No data found provided a credit hour definition for California. P16 indicated during the interview that a documented definition was not known. The California system does not have a clearly established definition. Documents referenced elements of a credit hour: representation of an instructional hour, 15-week semester, recognition of course completion, accumulation for degree and certificate requirements, and successful completion of course work. During our interview, P16 emphasized that common expectations and practices were that courses were substantial in content, depth, and rigor while requiring students to complete an amount of work expected for the course and the academic level. The other systems examined provided a documented definition of a credit hour. The definitions were found to be commonly accepted understandings.

How Much Time was a Credit Hour? The amount of time assigned to a credit hour varied between systems. The state organization with a documented definition agreed that an instructional hour was part of a credit hour. The commonly accepted 50 minute instructional hour was the base of a credit. Displayed in Table 5.13 is a comparative analysis of systems' learning time for one credit hour. However, the amount of student preparation time varied per system. The commonly held practice of credit hour may or

Table 5.12

Public University Systems' Documented Definition and Translation Policies

System	Credit Hour Defined	Translation Policy	Online Credit "Equivalent To"
California	No	No	Yes
Florida	Yes	No	Yes
Georgia	Yes	No	Yes
Indiana	Yes	No	Yes
New York	Yes	No	Yes
North Carolina	Yes	No	Yes
Ohio	Yes	No	Yes
Pennsylvania	Yes	No	Yes
Texas	Yes	No	Yes
Virginia	Yes	No	Yes

Table 5.13

Analysis of Learning Time per One Credit Hour

System	Credit hour type	Class/week	Time/class	Extra learning time	Total learning hours per credit hour
California	Not defined	Unknown	Unknown	Unknown	Unknown
Florida	Credit hour with instructor	1	50 mins	X hrs	15 hrs + 15X hrs
	Credit hour without instructor	1	50 mins	X hrs	(60 hrs minimum)
Georgia	Not defined	1	50 mins	X hrs	15 hrs + X hrs (750 mins minimum)
Indiana	Not defined	1	50 mins	X hrs	15 hrs + X hrs
New York	Not defined	1	50 mins	2 hrs	45 hrs
North Carolina	Not defined	1	50 mins		15 hrs (750 mins)
Ohio	As determined	1	50 mins	2 hrs	45 hrs (750 mins + 1,500 mins)
Pennsylvania	Not defined	1		X hrs	14 hrs + X hrs
Texas	Not defined	1	50 mins	X hrs	45-48 hrs + X hrs
Virginia	With and without instructor	1	50 mins	1-2 hrs	45 hrs

may not have included two hours of student preparation time. Beyond that, some systems may or may not have expected additional learning time beyond the one hour instruction plus two hours of student preparation. Systems that included two student preparation hours were New York, Ohio, and Virginia. The other systems, Florida, Georgia, Indiana, North Carolina, Pennsylvania, and Texas did not include a prescribed two hours of student preparation time. Instead, the amount of learning beyond the instructional hour was as determined. The exception was North Carolina, which did not indicate within its documents an expected amount of student work time outside of the classroom.

As discussed, the common acceptance of an instructional hour was basic for one credit hour. Also, there was variance on how much time was required of students beyond the instructional hour. Some systems did not provide any student time in their definitions. Other systems elaborated with the results ranging from one additional hour to an amount as determined. Table 5.13 provided a breakout of the various times allotted to one credit hour.

Instructor Involvement. The role of the instructor fluctuated between the systems, and in some cases, the learning modality. Table 5.13 provided a portrayal of instructor participation involved with one credit hour. Since California did not provide a documented definition, there was also no information by which to determine an instructor's role in learning. Several states did not clarify an instructor's duties as related to education. These systems include Pennsylvania, North Carolina, Georgia, Indiana, New York, and Texas; displayed in Table 5.13. It may be inferred that since, most of these systems did provide a reference to 50 minutes being involved in class time or instructional time, an instructor was directly involved at some point of the learning time.

For these systems, not defining an instructor's duties did not appear to affect the determination of total learning time for the basic credit hour.

The other systems within the sample did make mention of an instructor within their definitions of a credit hour. Ohio's system allowed an instructor's role to be determined by the local institution, faculty, and educational modality. Ohio did elaborately break down credit hour values based on the type of learning (see Appendix V). Within data collected about Ohio, it appeared that instructor involvement within education had an effect on total learning time involved for one credit hour. Without direct instructor participation in learning, there was a change in total learning time. It appeared that educational modalities that were student driven and/or experiential in nature without an instructor were more likely to require additional time for learning. Directed practice format for Ohio learners required six hours per week for duration of the term. This resulted in a minimum of 90 learning hours per credit hour assigned to the course. Learning that took place through observation required 18 hours per week. This calculated to 270 learning hours per credit hour each term. Ohio provided a "miscellaneous applications" modality within its documented explanations. Learning time for this format included an instruction hour, but a significant amount of student time was added to the equation resulting in 141 hours of learning time for one credit hour. The other learning types provided in Ohio's documents varied slightly by format, but did not require an amount of time higher than 45 learning hours per credit hour.

Like Ohio, Florida and Virginia distinguished between a credit hour with an instructor directly involved and a credit hour without direct instructor involvement. However, the definitions from these systems did not define learning modalities in detail

as Ohio. Regardless of instructor involvement, Florida did require additional student work, but did not set an amount of time beyond the instruction hour. Florida indicated total amount of learning time for courses without an instructor involved as 45 hours. When an instructor was involved, the required for a credit was15 instructional hours plus additional time as determined. At the minimum, this calculated to 30 hours. Virginia was similar to Florida by indicating that 45 learning hours per credit hour were required during a term.

Learning Time. A credit hour was based on an amount of learning time. As shown in Table 5.13, the total amount of learning ranged from no time being defined to 45+ learning hours per credit hour. With the exception of three systems, learning time commonly existed as 30-45 hours. California and North Carolina did not require student time outside of the instructional hour. California had no credit hour definitions, which resulted in zero learning hours defined per credit hour. North Carolina did list instructional time, but no student time. This calculated to 15 learning hours per term per credit hour. Pennsylvania, however, was different from the other systems in that its semester was defined as 14 weeks instead of the common 15 weeks. This reduced the amount of learning hours for Pennsylvania by at least one hour.

Within the other states data, there appeared two common amounts of time for a credit hour. The first standard was 15 instructional hours per term plus 15 weeks of as determined student work. These systems included Georgia, Indiana, and Florida. New York and Virginia used 45 learning hours per credit hour as their required time. Ohio did have the basic 45 hours of learning time per credit hour. However, the weeks of a semester were designated as 15 to 17 weeks. This could have changed the total amount of

learning hours to an amount greater than 45 hours per credit hour. Texas defined its credit hour time as 45-48 instructional hours plus 15 weeks of time as determined.

Definition Summary. The credit hour was a common element within American education. It has been used for over a century and was basically unchanged in meaning from the introduction of a credit hour. The credit hour appeared to be intricately interwoven within U.S. educational system. Each institution may have its own interpretation and application of meaning and value. The amount of learning involved in one credit hour was not defined in documentation, nor was learning clearly defined by interview participants. Instead, determination was made on the local level for the appropriate amount of learning in one credit hour and held against the standard of being rigorous and robust enough for content and academic level.

Responsibility

As a general statement, responsibility for credit hour determination was that of an institution and its faculty. At this local level courses and programs were developed and reviewed. The local level may have included institution departmental level. Similar to regional and national standards, systems placed responsibility on institutions and faculty for determining correct credit hour use and values. Dependent on the system, the oversight of systems may have included assessing local level decisions.

A variance was found within the role a state system had in credit hour responsibility. California had a multilevel curriculum review process for ensuring academic quality. This was especially so for any online courses and programs. Although a system wide curriculum board existed, each institution did have the right to assess any other institution's credit hours and course work when student transfer was involved.

Florida, Georgia, and Ohio held the local level responsible and relied on accrediting agencies to assess institutional decisions as appropriate for educational standards and to ensure quality controls were in place for credit hour production. Beyond the local level, Indiana, New York, North Carolina, Pennsylvania, Texas, and Virginia did have state review. The systems normally focused on program and degree level review, but may have reviewed individual courses as determined necessary. Otherwise, accreditation agencies were relied on for assessing appropriate credit hour assignment.

Systems appeared to take on less responsibility for credit hours, leaving the primary decisions to local level and accreditation commissions. As mentioned, there were state level reviews in place. With the exception of California, Pennsylvania, and Texas, the system level reviews may or may not have taken responsibility for credits. These systems did review local level decisions for appropriateness, but responsibility was on the local level. Along with California, Pennsylvania, and Texas, New York required that online courses and programs be reviewed through a state level review to ensure that online education was quality and met the same standards as traditional education.

Translation Policy

None of the systems reviewed had a specific policy to translate asynchronous online education into credit hours. The general consensus from the data indicated that online courses were to be equivalent to an on-campus course. Content, rigor, outcomes, and assessments were supposed to match regardless of educational modality. However, a few states did provide more guidance than stating that all learning was expected to be comparable to traditional courses.

New York specifically addressed online education by establishing time on task standards and required that all online courses had to be approved by the state. Time on task within New York system was structured based on the local level calculating the amount of time a student would take to complete course work. Two key elements of time on task were that the system provided what was and what was not considered in course time. Secondly, only curriculum designers or instructors developing courses were qualified to determine learning time. Any other person attempting to assign time would miss the specific course nuances and dynamics effecting total learning time.

Pennsylvania was the second state that considered how to translate asynchronous online education into credit hours. For this system, online education must have been equivalent to traditional learning. These guidelines began by stating that learning activities had to be "directly related" to course objectives and that objectives were "measurable for grading purposes." The learning materials required the direct oversight of the course faculty. Lastly, online learning was mandated to be equivalent to its counterpart classroom activities. Unique to Pennsylvania's standards was that homework and similar functions could not be considered when equating asynchronous online education to traditional course work.

Texas required a three level review for online courses. Faculty, administration, and the system's online advisory committee would strictly evaluate online courses. There were not any specifics provided regarding the tiered review process within Texas. Virginia was similar to Pennsylvania in that documentation indicated that "demonstration" had to be measurable ensuring quality was equivalent to any traditional delivery course.

Response to Question Two

Even though there were slight variations in state systems when compared to regional and national regulations, the general practice was to define a credit hour using time. The responsibility for determining and ensuring credit hour values and use, as indicated in system data, was placed on the local level, which included faculty and institution administration. Systems such as Texas and New York required that a system level review and approve any asynchronous online education. Even with this oversight, the determination of credit hour values still was placed at the local level. System level regulations did not provide any policies that specifically addressed asynchronous online education translation into credit hours. The standard was to hold all education against traditional classroom and the credit assigned to courses.

CHAPTER 6

SUMMARY, CONCLUSIONS, AND IMPLICATIONS

The findings in this study were consistent with information found in the literature. The basic understanding and definition of credit hours within the literature continues to the current day meaning and praxis found in higher education. Even though credit hour determination and use were ingrained within the American education system, there was evidence for other metrics that may provide more equitable tracking of all learning and regardless of educational modality. This chapter provides a summary of the research project and includes a discussion of the main conclusions and implications of this study for future practice and research.

Summary of the Study

Understanding how credit hours were determined for asynchronous online education was the primary purpose of this study. The two research questions that guided the project were:

1. What methods do national and regional policies set forth for determining the translation of asynchronous online class time into credit hours?
2. What methods do public higher education system policies set forth for determining the translation of asynchronous online class time into credit hours?

Literature was examined to address these questions. These resources provided information on credit hour definition, credit hour practices, and how credit hours were used with asynchronous online education. With this groundwork, policy and document

analysis were conducted on three levels of American educational organizations: federal, regional, and system. Additionally, interviews were conducted with persons representing regional accrediting commissions and public higher education systems.

Policy and Document Analysis

The first phase of research was conducted on the U.S. Department of Education. Searches were conducted to find policies and documents that provided credit hour meaning, use, and application for all forms of education. Specific attention was given to information associated with online education. The second stage of research involved finding and examining policies and documents from the six regional accrediting commissions. The third phase of this project gathered data from public higher education systems representing the top ten organizations as based on enrollments. Comparative in nature (Musick, 1998; Rose, 2002), policy and document analysis allowed for discovering similarities and differences in organizational policies and documents. Research and examination followed the guidelines presented by Bogdan and Biklen (2007), Hesse-Biber and Leavy (2006), and Smith (2002). These guidelines were used to create a research structure that allowed for systematically collecting data, analysis, and generating understanding from documented content.

Interviews and Analysis

In order to verify findings from the first segment of research, a purposeful sample was used. Participants' interview data were compared (McCulloch, 2004) to documentation collected. Persons representing the regional accrediting commissions and public higher education systems were contributors to this study. Interviewing persons who daily apply and use agency standards were believed to add more understanding and

details to the study (Bogdan & Biklen, 2007). Participants also provided a way of verifying or contrasting document findings. In addition to analyzing interview data with policy information, comparative analysis between interview transcripts also occurred.

Each participant responded to five questions that were constructed to guide an interview. These questions were designed in hope of gaining more insight and data concerning credit hour use with asynchronous online education. Interview questions were:

1. What published definition of the credit hour does the agency provide to its institutions/organizations?
2. What published guidelines does the agency have for calculating credit hour value for asynchronous online education courses?
3. In the absence of published materials, what practices are established to address the above questions?
4. Who is responsible to ensure consistent application and use of credit hours?
5. As related to credit hour values, what changes does your organization foresee, or have made, as the result of the U.S. Department of Education's *Program Integrity Issues: Final Rule*, October 29, 2010 (34 CFR Parts 600, 602 603, et al.)?

The interviews were informative and provided a significant additional amount of data for analysis.

Findings

The data collected from documentation and interviews addressed the research questions. A commonality was found between all organization levels examined. Each

defined and used the credit hour similarly. Each held traditional classroom standards as the standard to evaluate other educational formats. The national and regional data were broader in scope, but provided details that system data did not. National and regional explanations of standards were base on commonly held higher education practices. Public system data mirrored national and regional standards. The scope of the public data was more focused and referenced local institutions more than national and regional data. There was an expectation that system regulations would provide more in depth guidelines and standards since this level of governance was closer organizationally to course work. This, however, did not prove true.

National and Regional Translation Methods

One aspect of this study was to examine the methods of national and regional policies that determined the translation of asynchronous online class time into credit hours. There were no methods found in data that addressed or set standards regulating credit hour values for asynchronous online classes. Instead, data showed that credit hours assigned to online courses were based on traditional classroom time practices. In other words, asynchronous course work that did not have a time value was assigned time-based credit hours; in the same manner as a traditional course taking place at a set time and place. The enforcement of credit hours onto online education courses equated the learning time of one hour of instruction plus two hours of student work. Data indicated that faculty and institutions had the option to assign more learning time. Faculty and institutions added more time based on the level of instructor involvement and learning that was more experiential in nature. Data showed that persons made credit hour determinations based on their experiences and understanding of course work.

Assessing Credit Hour Values. The credit hour standard of one hour plus two hours of learning time existed in nearly all of the data collected. The national Department of Education and each of the six regional accrediting agencies evaluated local level decisions about credit hours. Data indicated that there was not an exact method to evaluate local credit hour assigned values. Instead, three elements of review were found. The first characteristic of national and regional review of institutional level credit hour use focused on program level reviews. Evaluation did not occur for each course unless there was reason found to investigate. The second factor found was accreditation review. Assessments of institutions were against what was described as "commonly held higher education practices." However, these practices did not have any definitive parameters. A third component of review was for evaluators to assess if institutional programs and courses were considered "rigorous, robust, and appropriate" for subject and academic level. Definitions did not exist for characteristics of rigorous, robust, and appropriate. For the last two assessment factors, evaluators based decisions on interpretation and judgments of the information provided.

Program Integrity Impact. The federal Department of Education introduced the *Program Integrity Issues (2010c)* ruling during the course of this study. Accrediting commissions and educational bodies were beginning to consider how to implement the new requirements during the course of this study. By implementing the ruling, the DOE placed a standardized credit hour definition for accreditation agencies and education institutions to follow. The DOE subsequently equated all learning modalities to the same credit hour value. Within *Program Integrity Issues,* a credit hour was defined as the

amount of learning that was “equivalent to” the learning within one instructional hour plus two student work hours.

Comparing the ruling’s credit hour definition to prior definitions found within data showed that the DOE did not significantly change credit hour meaning, value, or assignment to asynchronous online education and education in general. The new credit hour meaning maintained the common practice of credit hour decision making as before the ruling. Any policy change for translating asynchronous online classes into credit hour values did not occur; traditional classroom time-based credits continued.

Public Higher Education System Translation Methods

The second aspect of this study examined public higher education system policies to determine translation of asynchronous online class time into credit hour. Data clearly indicated that the public systems studied did not have policies for translating asynchronous online education into credit hours. In all systems, online courses had parallel on-campus classes, and the online classes matched the traditional course structure, content, and credit hours. Data indicated that asynchronous online learning matched the same standards of classroom learning. Therefore, learning associated to one hour of instruction plus two hours of student work for a traditional class was standard used.

In similar fashion of national and regional bodies, the use of a credit hour in public higher education remained the responsibility of local faculty and institutions. The local levels assigned credit hour values based on judgments of rigor and robustness of course content and if content and work were appropriate for subject and academic level. The *Program Integrity Issues* (2010c) ruling was not in effect during the entire study.

However, participant data indicated that no significant changes were expected. As with national and regional data, time-based credits hours continued to be assigned to nontime-based asynchronous online education. No significant differences existed between national, regional, and public higher education systems.

Conclusions

This study focused on policies within national, regional, and public higher education system level educational organizations. Three major conclusions emerged from the policies, interviews, and literature:

1. The federal government, accrediting agencies, and public higher education systems assign credit to asynchronous online education by the same metric as face-to-face classroom learning time.
2. Local institutions' administration and faculty have the responsibility for assigning credit hours to asynchronous online education.
3. There are some efforts toward considering a non-time based metric for assigning credit hours to asynchronous online education.

Conclusion One

The federal government, accrediting agencies, and public higher education systems assigned credit to asynchronous online education by the same metric as face-to-face courses based on classroom learning time. Within national, regional accreditation commissions, and public higher education systems a policy did not exist that provided a common metric to measure learning for asynchronous online education.

Findings indicated that a credit hour was a metric that was based on instructor and learner being together for a designated amount of time. Findings coincided with literature

(Heffernan, 1973; Lorimer, 1962; Mullin, 2001; Shaw, 1993; Shedd, 2003; Wellman & Ehrlich, 2003a, 2003b; Wolanin, 2003) and defined a credit hour as the time of one instructional hour plus two study hours outside of class. This three hour increment was then carried for the duration of a term. The norm was for a typical traditional class to have a three credit hour value. Although not discussed in detail, literature made reference that some learning formats included additional time for learners (discussed in sections that follow). Details about this practice were found within policies, documents, and interview data. A credit hour may be worth three learning hours, or a credit may be worth more than three hours. Local faculty and curriculum developers made determinations of total learning time.

Findings indicated that the credit hour measured time and did not measure learning, which is consistent with literature. Early in credit hour history, Patton (1945) argued that a credit hour was not truly a 60 minute hour, and that it did not provide an accurate measurement of education. Argued by Maeroff (1994), Meyer (1975), and the Web-Based Education Commission (2000), the credit hour system served institutions and governmental organizations and was antiquated. Thus, the credit did not meet educational formats. Similar points presented by Watkins and Schlosser (2002) and Poley (2008) indicated that credit hour use was not applicable for contemporary learning modalities.

Addressing misuse and appropriation of credits, the DOE issued the *Program Integrity Issues: Final Rule* (2010c). In doing so, the DOE defined the credit hour for all education formats. Also, this ruling required any organization that was recognized by the DOE to follow the new meaning. In short, the new parameters of the credit hour required an equivalent amount of learning that would take place during one instructional hour plus

two student study hours, or three learning hours. Analysis of the new definition with the traditional meaning showed that there was not any significant change to the original credit hour. However, the ruling standardized a credit hour to the same amount of learning time for all organizations and learning formats; i.e., three hours and the learning that occurred within those hours. The ruling did not provide information indicating how much learning occurred within a credit.

Before the ruling, the credit hour meaning and use was superimposed onto asynchronous online education. The result was that asynchronous learning was assigned credit values as determined for a traditional classroom format using time in seat. The *Program Integrity Issues* ruling defined a credit hour, but did not provide how to translate a time value unit for non-time learning format, nor did the ruling provide how much learning existed within three hours of time. The ruling propagated the same practices as before. Therefore, the results of the new ruling did not address any possible misuse or inappropriate decisions about education and translating credit hours for asynchronous online education.

Conclusion Two

Local institutions' administration and faculty had the responsibility for assigning credit hours to asynchronous online education. Even though all organizations studied had control over credit hours, data indicated that the local level had authority over the credit hour and who made the decisions of what credits were assigned to courses and all aspects of a course. Literature and data from national, regional, and systems addressed this point. A hierarchical type of organizational structure existed within data. At the highest level was the U.S. Department of Education. Findings indicated that the DOE oversaw

accrediting bodies, educational institutions, and in general the entire education system within the United States. Accrediting agencies existed to specifically govern institutions and provided a quality check for the education system. These organizations were in place based on field, region, or national stature and purpose. Public higher education system organizations added another contingency over institutions. The final organizational structure that existed was within the local institution level. At the institution level faculty and administration determined credit hours for courses and programs. Faculty, committees, and administration at institutions decided what was to be learned for each course. Pedagogy and quantity of work involved was decided. The place that learning takes place, the higher education campus, and the faculty involved with curriculum was where the ultimate responsibility was found for decisions concerning credit hour values. Other elements of the hierarchy served to assess and judge the decisions made at local levels.

Before *Program Integrity Issues* (2010c), deciding learning and credit hours, as well as evaluating compliance, was a matter of following what was interpreted as common acceptable higher education practices. Federal policies did not exist that provided specific parameters. Although accrediting commissions and many of the system offices provided definitions and guidelines, the actual meaning and application of these definitions were interpretive. When reviewing institutions for compliance, peer reviewers would assess the local level's decisions and application of standards.

The practice of persons assigning credit hour values to courses caused concern. As discussed previously, the credit hour metric was not considered appropriate for today's educational formats, and that the unit did not truly measure learning.

Additionally, documentation showed instances of what was determined noncompliance to standards and possible misuse. Literature contained information about the DOE issuing memorandums (Scott, 2009a, 2009b, 2009c) to regional accrediting agencies for the lack of oversight and the lack of definitive credit hour meaning and application. The DOE also was found lacking in oversight and directing its agencies and institutions. Lew (2003) reported that there were not sufficient regulations ensuring consistent and accurate evaluation of accrediting organizations and institutions. More specifically, Lew reported that the DOE did not have concrete values and definitions in place so that higher educational organizations would apply the same standard the same way. Lew provided supporting documentation that demonstrated that neither the accrediting agencies nor the DOE personnel evaluated institutions similarly.

Program Integrity Issues: Final Rule (2010c) contained statements that indicated the ruling was created and put into place to address issues, concerns, and misuse of standards such as those discussed. The ruling also denoted compliance was now clearly defined and expected of all educational organizations receiving federal funds. The local level was required to document how credit hours were determined and assigned to courses and programs. The same was true for accrediting bodies. Additionally, accrediting agencies were required to evaluate institutional compliance to standards.

The DOE placed a credit hour definition and compliance responsibilities into federal rule by implementing the ruling. In analyzing the regulation against data from accrediting agencies the ruling placed what was common practice into a defined federal regulation. Ultimate responsibility for translating credit hour values for asynchronous online education continued to rely on the local faculty and administration of each

institution. The *Program Integrity Issues: Final Rule* did not change how credit values were assigned to online education or who made the decisions about credit values. Credit hour values continued being assigned by faculty and local institution administration based upon what those persons deemed appropriate.

Conclusion Three

There was some effort toward using a non-time based metric for assigning credit hours to asynchronous online education. Found within data from national, regional commissions, and public systems that provided signs of a potential system. Records contained phrases that indicated the possibilities of alternatives to the existing credit hour system. As indicated before, the meaning of a credit hour varied slightly by organization. Participants made a strong emphasis that asynchronous online education met the same academic standards as traditional courses. Florida, New York, Texas, and Virginia systems had information in documentation signifying that more could be done for tracking learning. Similarly, regional accrediting agencies documentation had information that indicated time was not a focus of education.

National and Regional Alternatives. Data indicated that there was a need to change from the credit hour system for tracking and accruing learning. In the literature, the argument made was that current practices were not appropriate for today's learning formats. The specific concern raised by Maeroff (1994), Meyer (1975), and Web-Based Education Commission (2000) was that measuring learning for courses that do not have designated time in a classroom was not a function that credit hours were designed to do. Poley (2008) argued that learning should not be tracked by time, but should be measured

by learning accomplishments. The same points were presented by Kintzer (1997a, 1997b, 1999, 1982) and the Web-Based Education Commission (2000).

Adelman (2008, 2009) presented data on a metric that was being used in several other countries. The argument made was for the U.S. to examine the way it accredits and measures learning, and compare against other methods. Adelman did not believe any other system was perfect. However, what was being accomplished in other countries was something from which the American education system could learn. The method Adelman wrote about used mutually agreed competencies and standards. Many countries within the European Union provided input to develop the competency-based metric. Adelman emphasized that this system did not quickly develop. Instead, careful and deliberate actions methodically developed the principles that were put into place.

A common trait associated with measuring learning was the concern of appropriate academic content, breadth, length, and rigor. This thought was found in regional commissions documents and interview data. During institutional reviews, assessment of an organization's ability to ensure education appropriate for academic level and content was scrutinized. Expressions from interview participants indicated that the true focus of accreditation was learning. P13, representing the Higher Learning Commission, stated, "We are more interested in learning than in seat time." Other interview participants expressed similar sentiments.

System Alternatives. Emphasized during the interview with P10 from Florida, assigning credit hours was challenged by asking a question: "How do you know students are learning instead of how do you assign a credit value?" During the discussion that followed, indication was made that institutional benchmarking may be one way to

enhance or in lieu of a credit hour. P10's elaboration on this concept suggested that organizations could study how much learning occurred within credit hour periods to create a baseline indicating the amount of learning, or what learning concepts and objectives occurred during a set amount of time.

Another possibility was found in New York guidelines. The state system provided to institutions detailed guidelines for determining time on tasks. P20 pointed out the last paragraph of the policy by quoting from *Determining Time on Task in Online Education* (Office of College and University Education, 2010a), "Theoretically, one should be able to measure any course, regardless of delivery method, by the description of content covered" (¶27). The expectation was for faculty, and others involved with curricular decisions, to consider how much time a student spent accomplishing course work. The policy also indicated what activities should not be considered in determining time on task. In doing this calculation, decisions about credit hour assignment would be able to equate the time spent learning to the expected time involved for traditional education and subsequent credit hours.

Another alternative was outcomes-based measures. The Texas system mandated institutions to ensure that an online course had equivalent learning outcomes as a traditional classroom course would have (Minimum Length of Courses and Limitation on the Amount of Credit that a Student May Earn in a Given Time Period, 2003). P25 discussed during the interview that using outcomes as a measurement of learning did not require time as a factor. Instead, what was learned became a concern. The emphasis by P25 was on the ensuring learning outcomes so that education was equal regardless of the

modality. Assessment of objectives and outcomes also provided a tangible measurable result learning based on time quantities did not.

Like Texas, Virginia data indicated potential consideration for nontime-based methods. Documents for Virginia provided information that recognized asynchronous online education and other nontraditional courses were emerging methodologies. Found in other documents was that course work not classroom based had to demonstrate competency, proficiency, or course learning outcomes. The information indicated that doing so would ensure quality matching traditional classroom-based education.

Taking into consideration regional and system emphasis on learning, an alternative may be a system based on learning outcomes. The DOE provided a new credit hour definition that indicates a set learning amount within defined time periods. Establishing criteria based on the quantity of learning is now mandated. The new credit hour may serve as a beginning step to integrate educational standards removing the variable of time.

Implications for Practice and Research

The implications of this research were drawn from the related literature, findings, and conclusions of this study. It is anticipated that these suggestions will assist adult educators offering asynchronous online education for future course offerings and for further studies. There has been much written separately about online education and on credit hours. However, no studies were found that addressed the translation of asynchronous online courses into credit hours. The findings of this study could be used to improve the benefits of asynchronous online education for adults using this learning format.

Learning Equivalent to Three Hours

The use of this information could become a valuable tool improving current and future standards for asynchronous online education. As found, the credit hour was associated with curriculum described as rigorous, robust, and appropriate academic level. The data did not, however, provide information that determined concise measureable characteristics of the terms. The creation of the original credit hour was to provide uniformity between all academic institutions (Heffernan, 1973; Lorimer, 1962; Shedd, 2003; Wellman & Ehrlich, 2003a, 2003b; Wolanin, 2003). Data showed that credit hour consistency between agencies and institutions was not the case. Instead, the credit has been commonly recognized as the method to track learning. Actual practice resulted in varied interpretations by each institution that made credit hour values uncertain.

Adult educators could address vague characteristics of rigor, robust, and appropriate academic content by establishing common standards and possibly assigning ways to quantify terms. By doing so, educators could build on the Department of Education's new credit hour. The *Program Integrity Issues* (2010c) ruling was implemented in order to standardize credit hour application. Providing more clarity and refinement to the parameters of rigorous, robust, and academic appropriate content may allow for better measurement of courses gauged by the learning equivalent to one instructional hour and two student work hours.

Indicated by P10 from Florida, establishing educational benchmarks that take place during the expected three learning hours may be another way educators can work to provide measurable standards for online courses. Benchmarks at institutional, state, regional, and national levels would set amounts of learning and standards so that

educators would have baseline expectations to build online course curriculum. Established benchmarks, course work would allow for more similarity between institutions and further support the new credit hour definition provided by the DOE. Such benchmarks may better align credit hour use with the DOE expectations. Credit hours were designed to provide a uniform system. Implementing benchmark standards could work toward a more cohesive credit hour system providing more consistency in higher education.

Competency-Based Education

A competency-based system may be a more involved process than defining standards and establishing benchmarks: however, this metric may be plausible based on the data in this study. This measurement concept was discussed as one of the conclusions of the study. Literature reviewed provided one argument against the credit hour was that the unit did not measure learning (Kintzer, 1976, 1997a, 1997b, 1999; Maeroff, 1994; Web-Based Education Commission, 2000). Implementation of competency standards for course work could address measuring education with a nontime standard (Poley, 2008; Watkins & Schlosser, 2002). A competency-based system could potentially resolve the lack of concise credit hour use (A. Adelman & Somers, 1992; C. Adelman, 2008, 2009; Buchen & Le Cornu, 2005; Miller, 2007). Reasoning for competency-based system was found in data. Participants representing the Florida and Indiana public higher education systems, and persons representing the Higher Learning Commission and Western Association of Schools and Colleges, specifically discussed the advantages of having established proficiencies.

Examples of competency-based systems were found in reviewing the literature. These institutions may provide details about a proficiency structure and how it works in higher education. In its most basic form, a competency system awards certificates and diplomas based on assessments of learners' knowledge and skills (Lorenzo, 2007; Partidge, 2007; Testa, 2008). A. Adelman and Somers (1992) and C. Adelman (2008, 2009) wrote about an international competency-based system known as the *Bologna Process*. A U.S. institution that operates using proficiency as its learning metrics is Western Governors University (WGU) (Lorenzo, 2007; Riley, et al., 2001; Schweitzer, 2009). WGU is well recognized in the U.S. and holds regional, national, and field specific accreditation: (a) Commission of Colleges of the Northwest Association of Schools and Colleges (Lorenzo, 2007; Riley, et al., 2001; Schweitzer, 2009), (b) Distance Education and Training Council (Schweitzer, 2009), and (c) National Council for Accreditation of Teacher Education (Lorenzo, 2007; Schweitzer, 2009). International and American education has institutions that provide higher education using a competency-based system. WGU is a higher education institution that is recognized by several accrediting organizations and by the DOE. It appears, then, that a competency-based structure can be accepted by American education.

In much of the literature for this study a historical fact became apparent. Distance education, regardless of how it was offered, has not been unconditionally accepted within higher education. Larreamendy-Joerns and Leinhardt (2006), Meyer (Meyer, 1975), Pittman (1991), and Watkins (1991) presented the argument that within higher education a dichotomy existed about offering course work outside of a classroom. Regardless of the quality controls used to ensure a high standard for distance education, many within higher

education saw that learning remotely was an inferior form of learning and those on-campus courses provided the best way for educating persons. This separation became evident in how persons defined the purpose of education. Some believed that through learning persons and society could improve and that any person seeking education should be provided the opportunity. Others believed that through courses at higher education institutions could knowledge be disseminated. This limited opportunity to those with finances available to pay for books, tuition, and other associated costs. For adult learners additional challenges exist in gaining higher education. Presented in the literature, adults have to manage time away from work, time traveling to and from an institution, childcare, and availability of classes to fit their schedules. Many higher education institutions are less accessible for those who do not live in urbanized areas. Institutions also limited funding and resources for distance education curriculum development, staffing, and operations.

The same type of sentiment may be considered today for asynchronous online education. Even though online education showed a continued enrollment increase and that virtual learning was capable of meeting learners needs (Adeyemi & Osunde, 2005; Hrastinski, 2008; Parsad, et al., 2008; Wingard, 2004), online education courses has not been fully accepted (Bishop & White, 2007; Larreamendy-Joerns & Leinhardt, 2006; Pittman, 1991). The lack of research to develop a metric for asynchronous online learning may infer a prejudice. Enforcing classroom policies and standards onto non-classroom learning forces education to maintain traditional controls. Even though current structures have been reported inappropriate for online education (Adams & Morgan, 2007; Lew, 2003; Manning, 2011b; Scott, 2009c; Web-Based Education Commission, 2000) no data

was found that indicates research or development of appropriate methods to track asynchronous online education.

Current educational policies and practices are classroom centric. Educators working toward equalizing learning regardless of modality and location may make asynchronous online education more uniform for adult learners and their needs. These actions may also serve to change perceptions of online learning so that distance education and traditional learning may both be seen as quality academic work meeting the educational needs of adult learners.

Policy Change

Data clearly showed that concern about credit hour use has been an issue for many years. However, no data were found that indicated significant change from credit hour use. The lack of investigation into augmenting the credit hour and the lack of change creates reservations about the U.S. higher education system, accrediting agencies, the U.S. Department of Education, and the use of the credit hour system. Even though there have been many calls for change from credit hour use, the education system has not heeded requests. All of this serves as justification for detailed policy analysis that is critically analytical and evaluative.

Based on this study, considerations for policy change from the credit hour metric is warranted. Adams and Morgan (2007), Armstrong (1994), DiMartino and Castaneda (2007), and Web-Based Education Commission (2000), indicated that the current structure is not adequate and that significant change was required. The described changed placed focus on learning outcomes and on the learner. Similarly, Kintzer (1973, 1975, 1996), Patton (1945), Poley (2008), and others argued for reform. Data from this study

also indicated that a move from credit hours as a metric is desired. As found, a competency-based or outcomes-based system appears as desirable. Adelman (2008, 2009) and Kintzer (1973, 1975, 1996), presented strong arguments for a move from credit hours to a system that is based on student competencies. Persons interviewed from Florida, Texas, Commission of Colleges of the Northwest Association of Schools and Colleges, and Higher Learning Commission also discussed how a competency system is better fit for education.

Adelman (2008, 2009) wrote about the *Bologna Process* (European Higher Education Area, 2010, 2010a) taking place in Europe and countries outside of the continent. His thought was that the U.S. education system could learn from the work being done abroad. Adelman hoped that something similar would be considered and implemented in the U.S. to address many problematic issues found in American education. The *Process* began in 1999 following the *Bologna Declaration* (Berlin Follow Up Group, 1999) when many European Education Ministers joined together to assess and set common education standards. These principles were designed to allow students flexibility in transferring between institutions and other countries. The competencies were determined jointly to strengthen learning and to better assure what students accomplished in education was consistent. The elaborate system is based on commonly accepted standards, or competencies, for course work and for degrees.

An outcomes-based system would serve many functions and would address several issues found in the data. Aligning standards across the nation would allow great portability of learning from one institution to another. Articulation agreements would not be needed since all educational institutions would require the same competencies.

Working from common benchmarks would allow academic freedom for faculty and institutions, and would allow use of new and existing educational formats. Moving to a competency system would not require lower standards. In fact, set outcomes may better address issues the *Program Integrity Issues* ruling was hoped to correct. Variables of time, how much learning occurs in three hours, and fraud could be addressed by establishing measureable standards.

It is conceivable that if American education institutions and organizations worked toward a common goal and to better education for the country and learners, that a similar system could be developed for use. As seen with the *Bologna Process* the process requires dedication, determination, and joined efforts to become successful. Using the common credit hour definition now in place with the *Program Integrity Issues* (2010) ruling, the DOE and accrediting commissions could begin a process that would change American education system. Collaboration and further research is needed.

Closing

This study examined how credit hours were translated for asynchronous online education. Data showed that the U.S. education structure imposes a time-based credit hour system onto all forms of learning. Imposing a time-based measurement onto asynchronous online education has been argued against for many years. Instead of addressing the challenge, it appears that distance education formatted as asynchronous online education continues to be strictly controlled by traditional modes of education. The effort to maintain an existing antiquated system that is not able to provide more than it has only serves itself. Although a method was not found within policy to direct credit hour use with online learning, the findings indicated that alternatives were being

considered. A metric that focuses on learning and the learner regardless of how or where education occurs needs to be developed. Transitioning to a metric, may better serve the educational needs of the country and the administrative needs of institutions, accreditation, and the Department of Education.

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APPENDICES

APPENDIX A

IPEDS INFORMATION

The following information was gathered from National Center for Education Statistics. (2010). *Integrated Postsecondary Education Data System*. Retrieved October 19, 2010, from http://www.nces.ed.gov/IPEDS/about/, and was reformatted for readability. The following two pages are screen captures from web pages that provided the descriptive information following the images.

ies NATIONAL CENTER FOR EDUCATION STATISTICS

IPEDS INTEGRATED POSTSECONDARY EDUCATION DATA SYSTEM

Search IPEDS Go

Home | About | Newsroom | Training & Outreach | NPEC: IPEDS R&D | Publications | Glossary | Data Provider Center | Staff | Help

ABOUT IPEDS

What is IPEDS?

IPEDS is the Integrated Postsecondary Education Data System. It is a system of interrelated surveys conducted annually by the U.S. Department's National Center for Education Statistics (NCES). IPEDS gathers information from every college, university, and technical and vocational institution that participates in the federal student financial aid programs. The Higher Education Act of 1965, as amended, requires that institutions that participate in federal student aid programs report data on enrollments, program completions, graduation rates, faculty and staff, finances, institutional prices, and student financial aid. These data are made available to students and parents through the College Navigator college search Web site and to researchers and others through the IPEDS Data Center.

How is IPEDS Used?

IPEDS provides basic data needed to describe — and analyze trends in — postsecondary education in the United States, in terms of the numbers of students enrolled, staff employed, dollars expended, and degrees earned. Congress, federal agencies, state governments, education providers, professional associations, private businesses, media, students and parents, and others rely on IPEDS data for this basic information on postsecondary institutions.

IPEDS forms the institutional sampling frame for other NCES postsecondary surveys, such as the National Postsecondary Student Aid Study and the National Survey of Postsecondary Faculty.

Which Institutions Report to IPEDS?

The completion of all IPEDS surveys is mandatory for institutions that participate in or are applicants for participation in any federal student financial aid program (such as Pell grants and federal student loans) authorized by Title IV of the Higher Education Act of 1965, as amended (20 USC 1094, Section 487(a)(17) and 34 CFR 668.14(b)(19)).

More than 6,700 institutions complete IPEDS surveys each year. These include research universities, state colleges and universities, private religious and liberal arts colleges, for-profit institutions, community and technical colleges, non-degree-granting institutions such as beauty colleges, and others.

To find out if a particular institution reports to IPEDS, go to College Navigator and search by the institution name.

What Data Are Collected in IPEDS?

IPEDS collects data on postsecondary education in the United States in seven areas: institutional characteristics, institutional prices, enrollment, student financial aid, degrees and certificates conferred, student persistence and success, and institutional human and fiscal resources.

Institutional Characteristics

Institutional characteristics data are the foundation of the entire IPEDS system. These include basic institutional contact information, tuition and fees, room and board charges, control or affiliation, type of calendar system, levels of awards offered, types of programs, and admissions requirements.

Institutional Prices

IPEDS collects institutional pricing data from institutions for first-time, full-time, degree- or certificate-seeking undergraduate students. This includes tuition and fee data as well as information on the estimated student budgets for students based on living situations (on-campus or off-campus).

Enrollment

Because enrollment patterns differ greatly among the various types of postsecondary institutions, there is a need for both different measures of enrollment and several indicators of access. In IPEDS, the following enrollment-related data are collected:

- **Fall Enrollment** — Fall enrollment is the traditional measure of student access to higher education. Fall enrollment data can be looked at by race/ethnicity; gender; enrollment status (part-time or full-time); and or level of study (undergraduate or graduate).
- **Residence of First-Time Students** — Data on the number of first-time freshmen by state of residence, along with data on the number who graduated from high school the previous year, serve to monitor the flow of students across state lines and calculate college-going rates by state. These data are collected in even-numbered years.
- **Age Data** — The age distribution of enrolled students offers insight into the relationship between the changing demographics of

college-going cohorts and enrollment in different types of postsecondary institutions. They also permit detailed projections of enrollment by institutional type and by age. Because a student's dependency status is strongly related to age, the data can be used to provide estimates of the number of independent and dependent students attending postsecondary institutions. These data are collected in odd-numbered years.

- **Unduplicated 12-Month Head Count** — Enrollment figures based on the unduplicated head count of students enrolled over a 12-month period is particularly valuable for institutions that use non-traditional calendar systems and offer short-term programs. Because this enrollment measure encompasses an entire year, it provides a more complete picture of the number of students these schools serve.
- **Instructional Activity** — Data on instructional activity is measured in total credit and/or contact hours delivered by institutions during a 12-month period.
- **Total Entering Class** — Data on the number of incoming students (students enrolling for the first time in a postsecondary institution versus students transferring in from another postsecondary institution) at an institution. This measure permits the calculation of the graduation rate cohort as a proportion of the total entering student body.

Student Financial Aid

IPEDS collects data on the number of full-time, first-time degree/certificate-seeking undergraduate students who receive different types of student financial aid, including grants and loans, from different sources at each institution. IPEDS also collects data to show the average dollar amount of aid received by these students. Finally, as a result of the *Higher Education Opportunity Act*, IPEDS collects data to calculate the average net price at each institution for the following two groups: (1) full-time, first-time degree/certificate-seeking undergraduate students who receive grant and scholarship aid; and (2) full-time, first-time degree/certificate-seeking undergraduate students who receive Title IV federal student aid.

Degrees and Certificates Conferred (Completions)

IPEDS collects data on the number of students who complete a postsecondary education program by type of program and level of award (certificate or degree). Type of program is categorized according to the Classification of Instructional Programs (CIP) [link], a detailed coding system for postsecondary instructional programs. These data provide information on the number and location of completers by field. Business and industry, the military, and other groups that need to recruit individuals with particular skills use these data extensively. The data also help satisfy the mandate in the Carl D. Perkins Vocational Education Act for information on completions in postsecondary career and technical education programs.

Student Persistence and Success

IPEDS collects two types of data to help track postsecondary student progress and success.

- **First–Year Retention Rates** — The first-year retention rate measures the percentage of first-year students who had persisted in or completed their educational program a year later. These data have been collected since 2003.
- **Graduation Rates** — Graduation rate data provide information on institutional productivity and help institutions comply with reporting requirements of the Student Right-to-Know Act.

Institutional Resources

IPEDS collects institutional data on human resources and finances.

- **Human Resources** — Human resources data measure the number and type of staff supporting postsecondary education. Because staffing patterns vary greatly across postsecondary institutions, IPEDS measures human resources in three ways:
  - **Employees by assigned position** — These data classify all employees by full- or part-time status, faculty status, and occupational activity.
  - **Salaries** — These data include the number of full-time instructional faculty by rank, gender, and length of contract/teaching period; total salary outlay; and fringe benefits.
  - **Staff** — These data include demographic and occupational characteristics for staff at institutions.

- **Finances** — Finance data includes institutional revenues by source, expenditures by category, and assets and liabilities. This information provides context for understanding the cost of providing postsecondary education. It is used to calculate the contribution of postsecondary education to the gross national product. IPEDS collects finance data conforming to the accounting standards that govern public and private institutions. Generally, private institutions use standards established by the Financial Accounting Standards Board (FASB) and public institutions use standards established by the Governmental Accounting Standards Board (GASB).

Top

State Abbreviations

Value	Label	Value	Label
AL	Alabama	NJ	New Jersey
AK	Alaska	NM	New Mexico
AZ	Arizona	NY	New York
AR	Arkansas	NC	North Carolina
CA	California	ND	North Dakota
CO	Colorado	OH	Ohio
CT	Connecticut	OK	Oklahoma
DE	Delaware	OR	Oregon
DC	District of Columbia	PA	Pennsylvania
FL	Florida	RI	Rhode Island
GA	Georgia	SC	South Carolina
HI	Hawaii	SD	South Dakota
ID	Idaho	TN	Tennessee
IL	Illinois	TX	Texas
IN	Indiana	UT	Utah
IA	Iowa	VT	Vermont
KS	Kansas	VA	Virginia
KY	Kentucky	WA	Washington
LA	Louisiana	WV	West Virginia
ME	Maine	WI	Wisconsin
MD	Maryland	WY	Wyoming
MA	Massachusetts	MT	Montana
MI	Michigan	NE	Nebraska
MN	Minnesota	NV	Nevada
MS	Mississippi	NH	New Hampshire
MO	Missouri	VI	Virgin Islands

Variable Description: US Postal Service state abbreviation. See also FIPS STATE CODE (FIPS).
Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component.

Sector of Institution

Value	Label
0	Administrative Unit
1	Public, 4-year or above
2	Private not-for-profit, 4-year or above
3	Private for-profit, 4-year or above
4	Public, 2-year
5	Private not-for-profit, 2-year
6	Private for-profit, 2-year
7	Public, less-than 2-year
8	Private not-for-profit, less-than 2-year
9	Private for-profit, less-than 2-year
99	Sector unknown (not active)

Variable Description: One of nine institutional categories resulting from dividing the universe according to control and level. Control categories are public, private not-

for-profit, and private for-profit. Level categories are 4-year and higher (4 year), 2-but-less-than 4-year (2 year), and less than 2-year. For example: public, 4-year institutions. Control - A classification of whether an institution is operated by publicly elected or appointed officials (public control) or by privately elected or appointed officials and derives its major source of funds from private sources (private control). Level - A classification of whether an institution's programs are 4-year or higher (4 year), 2-but-less-than 4-year (2 year), or less than 2-year.

Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component

Level of Institution

Value	Label
1	Four or more years
2	At least 2 but less than 4 years
3	Less than 2 years (below associate)
-3	{Not available}

Variable Description: A classification of whether an institution's programs are 4-year or higher (4 year), 2-but-less-than 4-year (2 year), or less than 2-year.

Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component.

Control of Institution

Value	Label
1	Public
2	Private not-for-profit
3	Private for-profit
-3	{Not available}

Variable Description: A classification of whether an institution is operated by publicly elected or appointed officials or by privately elected or appointed officials and derives its major source of funds from private sources. Public institution - An educational institution whose programs and activities are operated by publicly elected or appointed school officials and which is supported primarily by public funds. Private not-for-profit institution - A private institution in which the individual(s) or agency in control receives no compensation, other than wages, rent, or other expenses for the assumption of risk. These include both independent not-for-profit schools and those affiliated with a religious organization. Private for-profit institution - A private institution in which the individual(s) or agency in control receives compensation other than wages, rent, or other expenses for the assumption of risk.

Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component.

Degree-Granting Status

Value	Label
1	Degree-granting
2	Nondegree-granting, primarily postsecondary
-3	{Not available}

Variable Description: A code indicating the degree-granting status of the institution. Degree-granting institutions offer an associate's, bachelor's, master's, doctor's or a first-professional degree. Nondegree-granting offers certificates or other formal awards.
Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component

Institutional Category

Value	Label
1	Degree-granting, graduate with no undergraduate degrees
2	Degree-granting, primarily baccalaureate or above
3	Degree-granting, not primarily baccalaureate or above
4	Degree-granting, associate's and certificates
5	Nondegree-granting, above the baccalaureate
6	Nondegree-granting, sub-baccalaureate
-1	Not reported
-2	Not applicable

Variable Description: Institutional category was derived using the level of offerings reported on the Institutional Characteristics (IC) component and the number and level of awards that were reported on the Completions (C) component.
Category descriptions: Degree-granting, graduate with no undergraduate degrees - These institutions offer a Master's degree, Doctor's degree or a First-professional degree and do not offer a Bachelor's degree or an Associate's degree.

Degree-granting, primarily baccalaureate or above - These institutions offer a Bachelor's degree, Master's degree,Doctor's degree or a First-professional degree. Also, the total number of degrees/certificates at or above the bachelor's level awarded divided by the total number of degrees/certificates awarded is greater than 50 percent.

Degree-granting, not primarily baccalaureate or above - These institutions offer a Bachelor's degree, Master's degree, Doctor's degree,or a First-professional degree. Also, the total number of degrees/certificates at or above the bachelor's level awarded divided by the total number of degrees/certificates awarded must be less than or equal to 50 percent.

Degree-granting, Associate's and certificates - Institutions offer an Associate's degree and may offer other postsecondary certificates, awards or diplomas of less than one academic year; at least one but less-than two academic years; at least two but less-than four academic years. This category also includes institutions that offer a postbaccalaureate certificate, Post-master's certificate or a First-professional certificate and the highest degree offered is an Associate's degree.

1. Nondegree-granting, above the baccalaureate - Institutions do not offer Associate's, Bachelor's, Master's, Doctor's or First-professional degrees, but offer either Postbaccaulaureate, Post-master's or First-professional certificates.
2. Nondegree-granting, sub-baccalaureate - Institutions do not offer Associate's, Bachelor's , Master's, Doctor's, or First-professional degrees, or certificates above the baccalaureate level. They do offer postsecondary certificates, awards or diplomas of less than one academic year; at least one but less than two academic years; or at least two but less than four academic years.

Technical details for Institutional Category (INSTCAT): Total degrees and certificates and total bachelor's degrees and all other degrees/certificates above the bachelor's degree awarded are derived using data from the Completions component.

Total bachelor's degrees and all other degrees/certificates above the bachelor's degree is the sum of:

1. Bachelor's degrees (CRACE24,AWLEVEL=5,MAJORNUM=1)
2. Postbaccalaureate certificates (CRACE24,AWLEVEL=6,MAJORNUM=1)
3. Master's degrees (CRACE24,AWLEVEL=7,MAJORNUM=1)
4. Post-master's certificates (CRACE24,AWLEVEL=8,MAJORNUM=1)
5. Doctor's degrees (CRACE24,AWLEVEL=9,MAJORNUM=1)
6. First-professional degrees (CRACE24,AWLEVEL=10,MAJORNUM=1)
7. First-professional certificates (CRACE24,AWLEVEL=11,MAJORNUM=1)

Total degrees and certificates is the sum of Bachelor degrees and all other degrees/certificates above the bachelors degree as defined above added to the following:

1. Associate's degrees (CRACE24,AWLEVEL=3,MAJORNUM=1);
2. Postsecondary certificates, awards or diplomas of at least two but less-than four academic years (CRACE24,AWLEVEL=4, MAJORNUM=1);

3. Postsecondary certificates, awards or diplomas of at least one but less-than two academic years (CRACE24,AWLEVEL=2,MAJORNUM=1);

4. Postsecondary certificates, awards or diplomas of less than one academic year (CRACE24,AWLEVEL=1,MAJORNUM=1);

Institutions are classified as Degree-granting (DEGGRANT=1) or Nondegree-granting (DEGGRANT=2) using level of offerings data reported on the Institutional Characteristics component. Degree-granting institutions offer an

1. Associate's (LEVEL3=1);

2. Bachelor's (LEVEL5=1);

3. Master's (LEVEL7=1);

4. Doctoral (LEVEL9=1);

5. First-Professional (LEVEL10=1) degree.

Any institutions that offer only certificates are Nondegree-granting.

1. Nondegree-granting institutions that offer a postbaccalaureate certificate (LEVEL6=1) or a post-master's certificate (LEVEL8=1) or a First-professional certificate (LEVEL11=1) are classified as Nondegree-granting, above the baccalaureate (INSTCAT=5).

2. Nondegree-granting institutions that only offer certificates of less-than four academic years are classified as Nondegree-granting, sub-baccalaureate (INSTCAT=6).

Degree-granting institutions whose highest degree granted are Associate's (HDEGOFFR=40) are classified as Degree-granting, Associate's and certificates (INSTCAT=4). (There are a few 4-year institutions that grant Postbaccalaureate or Post-master's or First-professional certificates in this category).

Degree-granting institutions that do not grant a Bachelor's degree (LEVEL5=0) and do not grant an Associate's degree (LEVEL3=0) are classified as Degree-granting, graduate with no undergraduate degrees (INSTCAT=1).

The remaining degree-granting institutions offer a bachelor's degree or an associate's degree, or both. For these institutions a percent of bachelor's degrees and all other degrees/certificates above the bachelor's degree of total degrees and certificates is

generated. If the percent is greater than 50, institutions are classified as Degree-granting, primarily baccalaureate or above (INSTCAT=2), If the percent is 50 or less, institutions are classified as Degree-granting, not primarily baccalaureate or above (INSTCAT=3).

Inactive institutions (CYACTIVE in (2,3)) and administrative units (Sector=0) were coded as not applicable. All Non-Title IV institutions that did not respond to the IC or Completions components were coded as not reported.

Degree-granting institutions whose completions data are reported with their parent institution were assigned the same code as the parent institution.

New degree-granting institutions that report offering a bachelor's degree on the current institutional characteristics file for the upcoming academic year, and have not yet reported bachelor's degrees on the current completions that covers the previous academic year June 1-July 30 were assigned as follows:

1. If an institution reported a zero in any program (CIP code) for bachelor's degrees or above (indicating the level was offered) and did not report a zero for any program (CIP code) at any level below the bachelor's, the institution was classified as Degree-granting, primarily baccalaureate or above.

2. If an institution reported a zero in any program (CIP code) at any level below the bachelor's degree and did not report a zero for any program (CIP code) for bachelor's degrees or above, the institution was classified as Degree-granting, not primarily baccalaureate or above.

For institutions that reported zeros for bachelor's degrees of above and for levels below the bachelor's, the maximum number of programs by level was used to determine the primary classification.

Variable Sources: Derived - IPEDS, Fall 2007, Institutional Characteristics and Completions.

Total Enrollment

Variable Description: Total men and women enrolled for credit in the fall of the academic year.

CREDIT - Recognition of attendance or performance in an instructional activity (course or program) that can be applied by a recipient toward the requirements for a degree, diploma, certificate, or other formal award.

NOTE: Enrollment reported is of the institution's official fall reporting date or October 15.

Variable Sources: Derived Data Feedback report - IPEDS, Winter 2006-07 and Spring 2007, Enrollment component.

Adult Age (25-64) Enrollment, All Students

Variable Description: Total fall enrollment of all adult students (age 25 through 64).
NOTE: Enrollment reported is of the institution's official fall reporting date or October 15.

Adult Age (25-64) Enrollment, Undergraduate

Variable Description: Total fall enrollment of adult undergraduate students (age 25 through 64).
NOTE: Enrollment reported is of the institution's official fall reporting date or October 15.

Adult Age (25-64) Enrollment, Graduate

Variable Description: Total fall enrollment of adult graduate students (age 25 through 64).
NOTE: Enrollment reported is of the institution's official fall reporting date or October 15.

Institution (Entity) Name

Variable Description: Institution (entity) name.
Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component.

Institution Name Alias

Variable Description: Institution name alias - This is a character string field that contains aliases that an institution can be referenced as. The aliases were submitted by the institution.

Street Address or Post Office Box

Variable Description: Institution (entity) street address or post office box.
Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component.

City Location of Institution

Note: The listed values are based on the whole IPEDS universe and don't represent your group.
Variable Description: City location of institution.
Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component

ZIP Code

Variable Description: ZIP code - if includes ZIP+4, does not include dash (-), e.g., 060102301. If ZIP+4 not reported, the last four positions will be blank.
Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component

General Information Telephone Number

Variable Description: General information telephone number.

Value	Label
1	Not reported
2	Not applicable
9	Not active

Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component.

Institution's Internet Website Address

Variable Description: Institution's internet website address,

Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component.

Distance Learning Opportunities

Value	Label
1	Yes
0	Implied no
-1	Not reported
-2	Not applicable

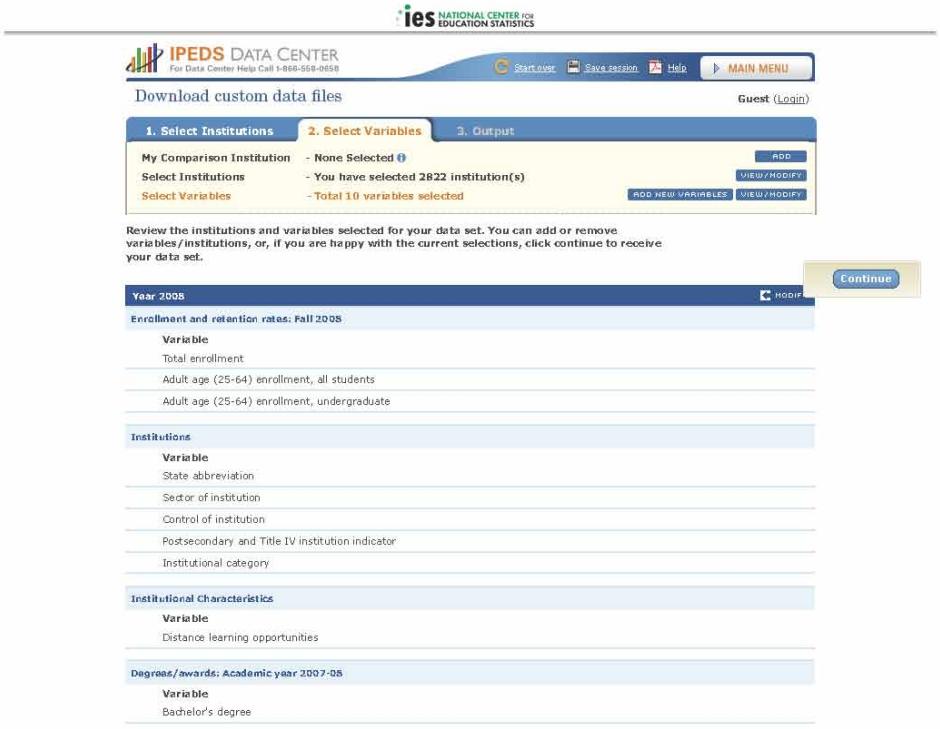
Variable Description: What types of special learning opportunities are offered by your institution? [Check all that apply]. Special learning opportunities - Indicate which of the listed special learning opportunities are offered by your institution. Teacher certification refers to pre-K through 12; if your institution provides certification for some levels (e.g., elementary only and not secondary) be sure to indicate that only certain levels are offered.

DISTANCE LEARNING - An option for earning course credit at off-campus locations via cable television, internet, satellite classes, videotapes, correspondence courses, or other means.

Variable Sources: IPEDS, Fall 2006, Institutional Characteristics component.

APPENDIX B

IPEDS CRITERIA



APPENDIX C

IPEDS FOR-PROFIT SYSTEMS BY ENROLLMENT

For-Profit System	Total Enrollment
University of Phoenix	390,207
DeVry University	61,164
American InterContinental University	48,064
Kaplan University	47,256
ITT Technical Institute	45,867
Strayer University	45,491
Walden University	34,779
The Art Institutes	33,165
Colorado Technical University	30,480
Ashford University	25,605
Capella University	25,245
Grand Canyon University	22,025
Argosy University	18,774
Keiser University	13,392
Academy of Art University	13,181
South University	10,675
ECPI College of Technology	9,522
Rasmussen College	8,268
TUI University	8,004
Northcentral University	7,468
Berkley College	7,252
Monroe College	6,900
Bryant and Stratton College	5,917
National American University	5,569
The Fashion Institute of Design & Merchandising	4,651
Herzing University	3,459
Chamberlain College of Nursing, LLC	3,203
Western International University	2,901
Florida National College	2,369
Kendall College	1,913
Jones International University, Ltc.	1,882
EDP College of Puerto Rico Inc	1,874
Briarcliffe College	1,728
Post Unviersity	1,687
LIM College	1,295
Brooks Institute	1,240

For-Profit System	Total Enrollment
University of Advancing Technology	1,217
The College of Westchester	1,196
Five Towns College	1,163
Central Penn College	1,091
Pacifica Graduate Institute	675
Midstate College	647
Salem International University	574
Chancellor University	422
Grand Total	959,457

APPENDIX D

IPEDS PUBLIC SYSTEMS BY ENROLLMENT

Public System	Total Enrollment
California	657,963
Texas	558,336
Florida	463,684
New York	384,234
Ohio	296,166
Michigan	292,575
Pennsylvania	271,042
Georgia	236,355
North Carolina	215,692
Indiana	214,536
Virginia	206,000
Illinois	203,254
Wisconsin	176,447
New Jersey	164,602
Alabama	161,531
Colorado	153,554
Maryland	152,530
Louisiana	142,830
Washington	142,684
Missouri	136,309
Tennessee	133,977
Minnesota	132,622
Arizona	127,641
Kentucky	119,248
Oklahoma	116,697
Utah	115,126
Massachusetts	112,774
South Carolina	98,750
Kansas	98,470
Nevada	96,067
Oregon	88,675
Arkansas	86,148
Mississippi	71,159
Iowa	69,006
West Virginia	68,456
Connecticut	67,589
New Mexico	57,788
Nebraska	56,066

Public System	Total Enrollment
Idaho	48,051
North Dakota	38,031
South Dakota	34,496
Montana	34,168
Maine	33,451
New Hampshire	29,309
Hawaii	28,369
Rhode Island	24,989
Delaware	24,034
Vermont	19,820
Wyoming	12,067
District of Columbia	5,584
Grand Total	7,307,130

APPENDIX E

WEB SEARCH PROTOCOL

Specific steps are listed as follows:

1. Go to agency/institution web site
2. Conduct search using terms: articulation, Carnegie Unit*, class hour*, course development, course hour*, credit hour*, credit unit*, credit*, distance education, distributed education, e-learning, online learning, transfer*. An asterisk (*) often serves as a wild card when conducting electronic searches. This allows for variables of a term found within results. Adjustments will be made coordinating with specific web site design and search capabilities.
3. In the event no hits are produced from specific web site searches, Google and Bing search engines will be used to search a specific web site. As a last resort, the specific organization being reviewed will be contacted asking where to find the information being sought.
4. Systematically review of search results will show relevancy of data; i.e., the information defines or pertains to credit hour use for course work or provides information on the translation of nontraditional or online “class time” into credit hours.
5. Web page as source: Pages will be converted to Adobe Acrobat PDF file format. This preserves the information on the web page at the time of review. This is important as web pages often are updated, replaced, or removed from access. APA reference

information will be recorded as the web page PDF file is cataloged and stored into EndNote for future review and use: URL, access date, author, and so forth.

6. Document file as source: Resources found in a file format such as Microsoft Word, PDF format, or another file format will be downloaded. This is crucial since files associated with web pages and those found on web sites are often are updated, replaced, or removed from Access. APA reference information will be recorded into an EndNote entry for future review and use: URL, access date, author, and so forth.
7. Notes about each data source will be made and stored electronically with its respective cataloged reference using EndNote. A hard copy of the notes will be printed and stored with each hard copy of the resources. Notations will include initial thoughts about the source and correlations to other sources. As constant comparison between findings occurs additional notations will be added.
8. A hard copy will be printed of each data source. These files will be stored using folders and storage containers, and marked using APA referencing. Doing so correlates the hard copy and the electronic copy so easy referencing and retrieval are possible.
9. When one finding is found, reviewed, and stored, the procedure begins again for each subsequent resource during the data collection from each institution's web site. When no more findings are made, the process will move to the next organization. This process will continue as data collection continues for the project.
10. Please note: electronic file storage and maintenance procedures will be used. This includes daily backups onto an external storage device. A weekly back-up copy will

be stored securely off site as precautionary measure should the main computer used and primary backup are damaged or destroyed.

APPENDIX F

ORGANIZATIONAL CHECKLIST

Name of organization: _____
Personnel contact information: _____
Name: _____
E-mail: _____
Phone: _____
Address: _____
_____
_____
Organization web site. URL: _____
Organization web search terms:

☐	articulation	☐	course hour*	☐	distance education
☐	Carnegie Unit*	☐	credit hour*	☐	distributed
☐	class hour*	☐	credit unit*		education
☐	course	☐	credit*	☐	e-learning
development				☐	online learning
				☐	transfer

Notes: _____
_____
_____

☐ **Document files downloaded.**

☐ **Web pages converted to Adobe Acrobat PDF file format.**

☐ **Hard copies printed, cataloged, and stored.**

Alternative search Google

☐	articulation	☐	course hour*	☐	distance education
☐	Carnegie Unit*	☐	credit hour*	☐	distributed
☐	class hour*	☐	credit unit*		education
☐	course	☐	credit*	☐	e-learning
development				☐	online learning
				☐	transfer

Notes: _____
_____
_____

☐ **Document files downloaded.**
☐ **Web pages converted to Adobe Acrobat PDF file format.**
☐ **Hard copies printed, cataloged, and stored.**

Alternative search Bing

☐ articulation	☐ course hour*	☐ distance education
☐ Carnegie Unit*	☐ credit hour*	☐ distributed
☐ class hour*	☐ credit unit*	education
☐ course	☐ credit*	☐ e-learning
development		☐ online learning
		☐ transfer

Notes: _____

_____

_____

☐ **Document files downloaded.**
☐ **Web pages converted to Adobe Acrobat PDF file format.**
☐ **Hard copies printed, cataloged, and stored.**

APPENDIX G

INITIAL E-MAIL SAMPLE

NAME:

I am a doctoral candidate in the Adult Education program at The University of Georgia, Athens, GA. My research includes researching for-profit education organizations, government education agencies, and regional accrediting bodies. I am examining how each organization assigns credit hour values for asynchronous online education courses. My research is supervised by Dr. Ronald M. Cervero, Associate Dean for Outreach & Engagement, College of Education, University of Georgia, and is approved by UGA's Human Subjects Office IRB Project 2010-10748-0.

This is an important subject as our nation continues to develop and use non-traditional forms of education in place of traditional classroom settings. Thus, I am contacting you to learn whom I may contact within your organization for a short telephone interview to learn how AGENCY oversees and determines credit hour value for asynchronous online learning by its campuses. The interview serves as validation of information I found from your web site pages and documents. I estimate the conversation will take approximately 20 minutes.

The information shared will not only benefit my research but also will add to the discussion about credit hour assignment and value within America's educational systems. This research will specifically benefit organizations like yours as accreditation is in the forefront of assuring quality education regardless of the format.

Thank you for your assistance. I look forward to hearing from you about my request.

Best wishes.

APPENDIX H

FOR-PROFIT LETTER SAMPLE

Date

Title First Name Middle Initial Last Name
Position/Office
Company
Address 1
Address 2
City, State Zip Code

Greetings Title Last Name:

I am a doctoral candidate in the Adult Education program at The University of Georgia, Athens, GA. My research includes researching for-profit education organizations, government education agencies, and regional accrediting bodies. I am examining how each organization assigns credit hour values for asynchronous online education courses. This is an important subject as our nation continues to develop and use non-traditional forms of education in place of traditional classroom settings.

I would like to make contact with the person responsible for policies concerning academic affairs and curriculum for your educational company. My hope is to set up a telephone interview to learn how Company determines credit hour value for asynchronous online learning for its campuses. The information you share will not only benefit my research but also will add to the discussion about credit hour assignment and value within America's educational systems. This research will specifically benefit organizations like yours as it offers non-traditional courses and degrees.

My contact information:

Fred Prasuhn, Doctoral Candidate
Department of Lifelong Education, Administration, and Policy
The University of Georgia
River's Crossing 416
850 College Station Road
Athens, GA 30602-4811
Email: fprasuhn@uga.edu or Phone: (706) 255-5581

Thank you for your assistance. I look forward to hearing from you or someone in your organization.

Best wishes,

Fred Prasuhn
Doctoral Candidate
Adult Education
University of Georgia

APPENDIX I

E-MAIL CONSENT FORM

Greetings
Thank you for agreeing to participate in my research on credit hour values for asynchronous online education. As you know, this is an important topic of discussion and change in our country's education system.

This email serves as the consent required by UGA research protocol when interviewing participants in a study. Please review the following text and reply e-mail your intent.

I have our scheduled interview time as . The telephone number I have to reach you is .

With your permission, I would like to record our conversation for future review. I will ask you about recording out conversation when I call you. As stated below, I will keep my research data and findings confidential.

I look forward to our telephone conversation. Thank you, again, for your kindness and support.

****

EMAIL CONSENT FORM
for
Virtual Seat Time: Translating Asynchronous Online Education "Class Time" Into Credit Hours
University of Georgia IRB Project 2010107480

By replying to this email I agree to participate in a research study titled "VIRTUAL SEAT TIME: TRANSLATING ONLINE EDUCATION “CLASS TIME” INTO CREDIT HOURS" conducted by Frederick Carl Prasuhn from the Department of Lifelong Education, Administration, and Policy at the University of Georgia under the direction of Dr. Ronald M. Cervero, Office of Outreach and Engagement, College of Education, University of Georgia. I understand that my participation is voluntary. I can refuse to participate or stop taking part at anytime without giving any reason, and without penalty or loss of benefits to which I am otherwise entitled. I can ask to have all of the information about me returned to me, removed from the research records, or destroyed.

The reason for this study is to study policies and practices involved in translating online education course work into credit hour values. If I volunteer to take part in this study, I will be asked to do the following things:

1) Answer questions about my institution's policies and practices in translating online education course work into credit hour values. (Approximately 30 minutes.)
2) Someone from the study may call me to clarify my information,
3) My information will be kept confidential.

The benefits of this study may influence higher education policies and practices to address the growing need to change current administrative structures to meet modern day online education demands and learners. There are no direct benefits to me.

No risk is expected but I may experience some discomfort or stress as part of the interview process.

No individually-identifiable information about me, or provided by me during the research, will be shared with others without my written permission, except if it is necessary to protect my welfare (for example, if I were injured and need physician care) or if required by law. I will be assigned an identifying number and this number will be used on all of the questionnaires I fill out.

The investigator will answer any further questions about the research, now or during the course of the project.

I understand that I am agreeing by my signature on this form to take part in this research project and understand that I will receive a signed copy of this consent form for my records.

Frederick Carl Prasuhn _____ _Date of email_
Name of Researcher **Date**
Telephone: (706) 255-5581
Email: fprasuhn@uga.edu

_____ _Date of email_
Name of Participant Date

By return email to the research I agree to participate in this research project. Please keep a copy of this message for your files.

Additional questions or problems regarding your rights as a research participant should be addressed to The Chairperson, Institutional Review Board, University of Georgia, 612

Boyd Graduate Studies Research Center, Athens, Georgia 30602-7411; Telephone (706) 542-3199; E-Mail Address IRB@uga.edu

APPENDIX J

INTERVIEW REMINDER AND QUESTIONS

Greetings name

In preparation for our telephone interview, interview date and time, I am forwarding to you the guiding interview questions that I will use. These questions are listed below. As you review the questions below, if you believe there are documents and web links that compliment your statements and provide more information please mention that fact during our interview and forward copies and URLs to my email address (fprasuhn@uga.edu or fprasuhn@gmail.com).

I appreciate you taking time from your schedule and duties to support me in my research project. I am eager to learn your responses during our conversation.

Interview Guiding Questions

1. Does the agency provide a published definition of the credit hour to its institutions/organizations?
2. What published guidelines does the agency have for calculating credit hour value for traditional and online education courses?
3. In the absence of published materials, what are established practices to address the above questions?
4. Who is responsible to ensure consistent application and use of credit hours?
5. As related to credit hour values, what changes does your organization foresee, or have made, as the result of U.S. Department of Education's Program Integrity Issues: Final Rule, October 29, 2010 (34 CFR Parts 600, 602 603, et al.)?

APPENDIX K

INTERVIEW NOTE FORM

name phone number interview date & time

Organization Email

☐ Consent received ☐ Permission to record

Protocol

Greetings and gratitude.
Verify consent and recording permissions.
Interview Guiding Questions

6. Does the agency provide a published definition of the credit hour to its institutions/organizations?

7. What published guidelines does the agency have for calculating credit hour value for traditional and online education courses?

8. In the absence of published materials, what are established practices to address the above questions?

9. Who is responsible to ensure consistent application and use of credit hours?

10. As related to credit hour values, what changes does your organization foresee, or have made, as the result of U.S. Department of Education's Program Integrity Issues: Final Rule, October 29, 2010 (34 CFR Parts 600, 602 603, et al.)?

APPENDIX L

IRB APPLICATION AND APPROVAL

The University of Georgia

Human Subjects Office (HSO)
612 Boyd GSRC ■ Athens, GA 30602-7411
Phone: 706-542-3199 ■ Fax: 706-542-3360 ■ irb@uga.edu
DHHS Assurance No.: FWA00003901

Institutional Review Board (IRB)

HUMAN RESEARCH APPLICATION

To submit: http://www.ovpr.uga.edu/hso/how/application

IMPORTANT: ***Please respond to all the questions. Do not leave items blank; if not applicable, mark N/A. Please note that incomplete applications may result in delayed review. Click on the hyperlinks (text underlined in blue) to obtain additional information.***	***For Human Subjects Office Use Only*** **Project #:** **Date Received:** **Type of Review:** ☐ **Exempt** ☐ **Expedited** ☐ **Full**

Section A: PROJECT INFORMATION

1. **Study Title:** Virtual Seat Time: Translating Online Education "Class Time" Into Credit Hours
2. **Application Type:** ☒ New Project ☐ Response to Initial Review (*All revisions must be in italics or different font color.*)
   ☐ 5-Year Renewal; Previous IRB number:
3. **Principal Investigator:** (*Must be UGA faculty or senior staff. See Eligibility to Serve as PI.*)
   Name: Ronald M. Cervero **Title:** Dr.
   Department Name: Office of Outreach and Engagment, College of Education
   Mailing Address: Aderhold Hall, University of Georgia, Athens, GA 30602
   Phone: 7065422221 **UGA E-mail** (Required): rcervero@uga.edu
4. **Co-Principal Investigator:** *(Required only if for thesis/dissertation or other student project.)*
   Name: Frederick Carl Prasuhn **Title:** Mr.
   Department: Lifelong Education, Administration, and Policy, College of Education
   Mailing address: 350 Will Wynne Road, Rayle, GA 30660-2515
   Phone: 7062555581 **UGA E-mail** (Required): fprasuhn@uga.edu
5. **Anticipated Start Date:** (*Must be at least 4 weeks after application is received.*) June 1, 2010

Section B: PROJECT FUNDING

1. **Funding Status**: ☐ Funded ☐ Pending ☒ No Funding
2. **Funding Source:** ☐ Internal Account #:
   ☐ External Funding Source: OSP Proposal or Award #:
3. **Name of Proposal or Award PI** (if different from PI of IRB protocol):
4. **Proposal or Award Title** (if different from title of IRB protocol):

Section C: STUDY PERSONNEL / RESEARCH TEAM

Including the PI, identify all personnel who will be engaged in the conduct of human research. ***Important Note:*** *All researchers listed below are required to complete the CITI IRB Training prior to submission of this application. This application will be returned to PI for resubmission if training requirement has not been satisfied. To add more names, bring cursor to outside of last row, and press "enter" key.*

Name	E-mail	*Institution
Ronald M. Cervero	rcervero@uga.edu	University of Georgia, College of Education
Frederick Carl Prasun	fprasuhn@uga.edu	University of Georgia, College of Education

**Submit an Individual Investigator Agreement for all study personnel affiliated with an institution that does not have an assurance with the Office for Human Research Protections or OHRP (typically, local schools, private doctors' clinics).*

Section D: PRINCIPAL INVESTIGATOR'S ASSURANCE

As the Principal Investigator, I have the ultimate responsibility for the conduct of the study and the protection of the rights and welfare of human participants. *By affixing my signature below,*

- I assure that all the information contained in this Human Research Application is true and all the activities described for this study accurately summarize the nature and extent of the proposed participation of human participants.
- If funded, I assure that this proposal accurately reflects all procedures involving human participants described in the grant application to the funding agency.
- I agree to comply with all UGA policies and procedures, as well as with all applicable federal, state, and local laws on the protection of human participants in research.
- I assure that all personnel listed on this project are qualified, appropriately trained, and will adhere to the provisions of the approved protocol.
- I will notify the IRB regarding any adverse events, unexpected problems or incidents that involve risks to participants or others, and any complaints.
- I am aware that no change(s) to the final approved protocol will be initiated without prior review and written approval from the IRB (except in an emergency, if necessary to safeguard the well-being of human participants and then notify the IRB as soon as possible afterwards).
- I understand that I am responsible for monitoring the expiration of this study, and complying with the requirements for an annual continuing review for expedited and full board studies.
- If human research activities will continue five years after the original IRB approval, I will submit a new IRB Application Form. (*Exceptions:* If the research is permanently closed to the enrollment of new participants, all participants have completed all research-related interventions, and the research will remain active only for long-term follow-up of participants; or if the remaining research activities are limited to analysis of individually-identifiable private information.)
- I understand that the IRB reserves the right to audit an ongoing study at any time.
- I understand that I am responsible for maintaining copies of all records related to this study in accordance with the IRB and sponsor guidelines.
- I assure that research will only begin after I have received notification of final IRB approval.

Signature of Principal Investigator _____ **Date** (mm/dd/yyyy):

Section E: CONFLICT OF INTEREST (COI)

1. **Is there any real, potential, or perceived conflict of interest on the part of any study personnel** *(e.g., financial or business interest, stock or stock options, proprietary interest, inventorship, consultant to sponsor)***?** ☐ **Yes** ☒ **No**
2. **If yes, please identify personnel and explain.** ***Important Note:*** *Please review the* ***UGA Conflict of Interest Policy****. Final IRB approval cannot be granted until all potential conflict matters are addressed.*

Section F: LAY PROJECT SUMMARY

Briefly describe in simple, non-technical language a summary of the study, its specific aim(s)/objective(s), and its significance or importance. *Response should be limited to 250 words and easily understood by a layperson.*

The purpose of this project is to study policies and practices involved in translating online education course work into credit hour values. Data will be collected from institutional documents and websites. A second phase of data collection will come from structured interviews with administrative persons from various colleges and universities within the State of Georgia.

The significance of this study will address how online course work, which has no "seat time" or designated class time with instructor, is measured by the credit hour, which is based on in-class seat time with an instructor. This

is needed as significant enrollment increases in online education are occurring yearly, and the rising need of continual learning by adults to stay informed and equipped for work and life in a growing global economy and information age.

The largest online education enrollments are the result of adults 25+ years of age entering college for the first time or returning to complete college courses. Thus, online education is challenging face-to-face classroom instruction and supportive structures based on in-class time which translates into credit hours. Adult learners require continual learning to stay competitive and current. Changing how academic recognition is accomplished may better suit lifelong learning. Doing so would permit acceptance of learning regardless of source, thus giving academic recognition, or "credit," for all education.

It is hoped that this research will influence higher education policies and practices to address the growing need to change current administrative structures to meet modern day online education demands and learners.

Section G: HUMAN RESEARCH PARTICIPANTS

1. **Provide a general description of the targeted participants** *(e.g., healthy adults from the general population, children enrolled in an after-school program, adolescent females with scoliosis)***, and indicate the estimated total number, targeted gender, and age.** *To add a row, bring cursor to outside of last row, and press "enter" key.*

Targeted Population	Total Number	Targeted Gender	Specify age or age range
Administrative persons from GA colleges and universities within academic affairs.	10	N/A	18+

2. **Identify the inclusion and exclusion criteria.** If two or more targeted populations, identify criteria for each.
   a. List inclusion criteria. Institutional accreditation by one of the nine regional accrediting agencies; Institution offers online courses and/or degrees/certificates; has administrative responsibilities related to academic affairs and determining course work credit hour values.
   b. List exclusion criteria. Does not meet above criteria.
3. **If the research will exclude a particular gender or minority group, please provide justification.** N/A
4. **Will participants receive any incentives for their participation** (e.g., payments, gifts, compensation, reimbursement, services without charge, extra class credit)**?** ☐ **Yes** ☒ **No**
   a. If yes, please describe. For multiple sessions, include scheme to pro-rate incentives.
   b. If offering extra class credit, describe a comparable non-research alternative for receiving incentive.

Section H: RECRUITMENT AND ELIGIBILITY OF PARTICIPANTS

1. **Describe how potential participants will be initially identified** (e.g., public records, private records, etc.)**.** Review based on institutional websites will provide institutional information (see 2a) and contact information of personnel working within the academis affairs office.
2. **Describe when, where, and how participants will be initially contacted. Initial contact will be made through email based on information provided by the institution's web site.**
3. **Advertisements, flyers, and any other materials that will be used to recruit participants must be reviewed and approved before their use.** Check all that apply below and submit the applicable recruitment material/s**.**
   ☐ **No Advertising** ☐ **Bulletin boards** ☒ **Electronic media (e.g., listserv, emails)** ☐ **Letters**
   ☐ **Print ads/flyers (e.g., newspaper)** ☐ **Radio/TV** ☒ **Phone call** ☐ **Other** *(please describe)*
4. **Describe any follow-up recruitment procedures. If no response is received to above actions (see #2) within one week a phone call will be made to the same person. If the person is not available, voice mail will be left indicating my name, affiliation with University of Georgia, how to contact me, and the intent of my call. I will ask if another person should be contacted, and my contact information be shared with that person. I will also ask if may have the new person's contact information.**

5. **Describe how eligibility based on the above inclusion/exclusion criteria will be determined** (e.g., self-report via a screening questionnaire, hospital records, school records, additional tests/exams, etc.). Institutional website and documentation.

Section I: RESEARCH, DESIGN, METHODS AND PROCEDURES

1. **Describe the research design and methods of data collection.**

The design of this research is based on policy analysis. In general, policy analysis comes from a concern with the way governing bodies regulate through policies: the causes, the processes, and the impact of policies. Policy analysis is comparative in nature by holding one document and its meaning against other documents and their meanings (Rose, 2002). Musick (1998) also defines policy analysis as an evaluation of a method, program, or policy relational to its effectiveness and successful outcomes or results. Within this project the more general definition of policy analysis is used aligning the terms evaluation and analysis to refer to the same meaning. Also, the content of policy will be the focus of the research instead of the procedures and effects of policy. Examining contents of policies is qualitative in nature in that research analyzes the text and content of a given policy. When qualitative data are systematically and rigorously collected, the research is linked to other forms of scientific inquiry permitting the researcher to generate understanding from the inter-related data (Bogdan & Biklen, 2007; Hesse-Biber & Leavy, 2006).

Data collected are expected to provide definitive policies and procedures that exist and ones that are being practiced routinely by higher educational institutions and agencies. Studying institutional documents and institutional practices related to awarding credit hours are chosen for this study in an effort to more clearly understand what is occurring in higher education institutions relational to credit hour assignment for online education. Descriptive data will be collected from document and practice analysis. Gathering data will be accomplished by a "systematic, purposeful, and disciplined process of discovering reality structured from human experience" (Sharan B. Merriam & Simpson, 2000, p. 5) to discover data concerning credit hour use with online education.

As qualitative research design provides focus on the purposes of the research, it is methods—research questions and the strategies that best meet the need for gathering data—Denzin and Lincoln explain (1994a), that qualitative researchers choose instruments which will gather data and provide the working structure of the project. The methods must be based on the nature of the project, the questions that are being asked, and the context of this study. Thus, this generic qualitative study begins with by surveying the national Department of Education's web site and documents, then systematically moving to accrediting agencies' web sites and documents, and then institutional web sites and documents. Funneling from national to specific institutions guides the research process beginning with broad data moving to specific data. Through this process a purposeful sampling will emerge as criteria are met. Institutions within the sample will then be contacted to arrange a structured interview with a person from academic affairs office. The collected data will then be analyzed to address the research questions.

2. **If applicable, identify specific factors or variables and treatment conditions or groups (include control groups).**
3. **Indicate the number of research participants that will be assigned to each condition or group, if applicable.**
4. **Describe in detail, and in sequence, all study procedures, tests, and any treatments/research interventions. Include any follow-up(s).** ***Important Note:*** *If procedures are long and complicated, use a table, flowchart or diagram to outline the study procedures from beginning to end.*

Data collection will begin by reviewing agency/institutional website (e.g., www.ed.gov). Information will be gathered on credit hour definition, and credit hour use—especially within the context of online education. Another avenue of inquiry will focus searches for information about online education and guidelines established relative to course development and assigning credit hour values. Web pages and documents found will be converted into Adobe Acrobat Portable

Document Format file (PDF). All resources will be cataloged using Endnote software noting access date, URL, agency or institution, and so forth. The PDF file will be attached to its corresponding Endnote reference. Paper copies of documents will be coded and filed to correspond with the Endnote information. Specific notations about the document will be made into the Endnote reference, printed, and kept with its corresponding paper file.

Specific steps are listed as follows:

1. Go to agency/institution web site
2. Conduct search using terms: articulation, Carnegie Unit*, class hour*, course development, course hour*, credit hour*, credit unit*, credit*, distance education, distributed education, e-learning, online learning, transfer*. An asterisk (*) often serves as a wild card when conducting electronic searches. This allows for variables of a term found within results. Adjustments will be made coordinating with specific web site design and search capabilities.
3. In the event no hits are produced from specific web site searches, Google and Bing search engines will be used to search a specific web site. As a last resort, the specific organization being reviewed will be contacted asking where to find the information being sought.
4. Systematically review of search results will show relevancy of data; i.e., the information defines or pertains to credit hour use for course work or provides information on the translation of nontraditional or online "class time" into credit hours.
5. Web page as source: Pages will be converted to Adobe Acrobat PDF file format. This preserves the information on the web page at the time of review. This is important as web pages often are updated, replaced, or removed from access. APA reference information will be recorded as the web page PDF file is cataloged and stored into EndNote for future review and use: URL, access date, author, and so forth.
6. Document file as source: Resources found in a file format such as Microsoft Word, PDF format, or another file format will be downloaded. This is crucial since files associated with web pages and those found on web sites are often are updated, replaced, or removed from Access. APA reference information will be recorded into an EndNote entry for future review and use: URL, access date, author, and so forth.
7. Notes about each data source will be made and stored electronically with its respective cataloged reference using EndNote. A hard copy of the notes will be printed and stored with each hard copy of the resources. Notations will include initial thoughts about the source and correlations to other sources. As constant comparison between findings occurs additional notations will be added.
8. A hard copy will be printed of each data source. These files will be stored using folders and storage containers, and marked using APA referencing. Doing so correlates the hard copy and the electronic copy so easy referencing and retrieval are possible.
9. When one finding is found, reviewed, and stored, the procedure begins again for each subsequent resource during the data collection from each institution's web site. When no more findings are made, the process will move to the next organization. This process will continue as data collection continues for the project.
10. Please note: electronic file storage and maintenance procedures will be used. This includes daily backups onto an external storage device. A weekly back-up copy will be stored securely off site as precautionary measure should the main computer used and primary backup are damaged or destroyed.

Interviews

Structured interviews will be conducted with persons from the academic affairs or curriculum office of the institution. Initial contact will be made through email based on information provided by the institution's web site. If no response is received within one week a phone call will be

made to the same person. If the person is not available, voice mail will be left indicating my name, affiliation with University of Georgia, how to contact me, and the intent of my call. I will ask if another person should be contacted, and my contact information be shared with that person. I will also ask if may have the new person's contact information. However, should my initial email receive a response, I will act accordingly based on the information provided me. The same would apply to the phone call or a returned phone call to me. Should no contact be made after the above actions, I will use the institution's directory to call another person and ask with whom I should speak for my inquiry.

At the time an interview is set, I will ask the person to provide copies, when we meet, of any documentation or web links to documentation that he/she believes would be beneficial for my research when we met. I would confirm the set appointment one week prior the date and include a copy of the interview questions. As a follow-up to the interview, a personally written thank you note will be sent to each participant.

The interview protocol is as follows:

A. Greeting followed by presentation and processing of Consent Form.
B. Initiate recording.
C. Discuss procedure for interview.
D. Interview Questions:
    1. How does your institution define a credit hour?
    2. What policy/policies does your institution have for calculating and assigning credit hour value to nontraditional courses as found in an online learning setting?
    3. (Conditional question) If there are not established policies for credit hour use and conversion, what practices does your institution use to assign credit hour value to nontraditional courses as found in an online learning setting?
    4. What policy/policies does your institution have for calculating transferring credit hour values into your institution's credit hour equivalents?
    5. (Conditional question) If there are not established policies for calculating transferring credit hours to your institution's credit hour values, what practices does your institution use to assign credit hour value to incoming transferring credit hour values
    6. How is consistent application of the above policy/policies (and/or practices) guaranteed?
E. Thank participant for time and for providing interview.
F. Stop recording.
G. If not already supplied, I will ask about the documentation requested that provides the institution's policy/practice on assigning and using credit hours.
H. Coding responses to remove any personal or professional identification beyond that required for research project will protect confidentiality of the participant's identity. No private information is being gathered. Digital recordings and transcriptions will be securely protected.
I. Interview notes will be made during and after each interview. Such notations will be securely protected and added to each interview's file.
J. Transcriptions will be made of each interview for analysis.

5. Describe the proposed data analysis plan and, if applicable, any statistical methods for the study.

Document analysis is core to this research project. This type of analysis will involve comparative and inductive analysis. From the beginning of data collection to the final write up, information findings will be compared against other collected sources of data. Constant comparison of data is part of policy analysis. Checklists will be completed and compared during the project to assure complete data are collected and to provide insight from the data. The final outcome will

result in a systematic analysis of Georgia's institutions' online education credit hour policies and practices.

The purpose of this study is to learn how institutions translate online education "time" into credit hours. Two specific questions guide this research: 1) What methods or formula do policies contain or set forth for determining the translation of online class time into credit hours? 2) What practices are used for online class time to assign credit hour equivalence? Data collection will be conducted in three levels: national, regional, and institution. From these distinct tiers data will be analyzed to respond to the research questions and provide understanding of the credit hour definition and use.

National Review. Data collected first is from the national level of education governance within the United States; that is, Department of Education. Data gathered and analyzed from this agency will provide the base definition of credit hour within America. Also, data will be reviewed looking for answers to how the credit hour should be calculated and used for traditional and online educational settings. More specifically, data will be reviewed to respond to the following questions: 1) Does the agency provide a published definition of the credit hour to its institutions/organizations? 2) What published guidelines does the agency have for calculating credit hour value to traditional and online education courses? 3) What published guidelines are there for translating incoming transfer credit hours into the institution's credit hour values? 4) In the absence of published materials what practices are established to address the above questions? 5) What controls are in place to assure consistent application and use of credit hours? These questions will guide investigation of data to learn how each agency guides its intuitions in determining credit hour value for traditional and online education course work. It is hoped that from this level of investigation that data will provide overall guidance in using and calculating credit hour values for course work.

Regional Review. The second phase of data analysis will be conducted on the information gathered from each of the nine regional accrediting agencies listed above. As discussed, these governing bodies are responsible to over see and provide accreditation to institutions providing education to all levels of learning from k12 through higher education. Data gathered will be reviewed for credit hour definition and information on using the credit hour. More specifically, data will be reviewed to respond to the following questions: 1) Does the agency provide a published definition of the credit hour to its institutions/organizations? 2) What published guidelines does the agency have for calculating credit hour value to traditional and online education courses? 3) What published guidelines are there for translating incoming transfer credit hours into the institution's credit hour values? 4) In the absence of published materials what practices are established to address the above questions? 5) What controls are in place to assure consistent application and use of credit hours? These questions will guide investigation of data to learn how each agency guides its intuitions in determining credit hour value for traditional and online education course work. It is hoped that from this level of investigation that data will provide greater detail than the national level when using and calculating credit hour values for course work.

Institutional Review. The third phase of data analysis involves focusing on State of Georgia's higher education institutions. To answer specially the research questions of existent policies and practices, the data will be reviewed for specific information from each institution: 1) Does the institution provide a published definition of the credit hour to its students, faculty, and staff? 2) What published guidelines does the institution have for calculating credit hour value to traditional and online education courses? 3) What published guidelines are there for translating incoming transfer credit hours into the institution's credit hour values? 4) In the absence of published

materials what practices are established to address the above questions? 5) What controls are in place to assure consistent application and use of credit hours?

Using the Institutional Checklist (Appendix XXX: Institutional Checklist) will provide summation of each intuition, which will allow for easier comparison between the various bodies. The form will also allow tabulations of responses to the questions to provide a larger understanding of what credit hour practices are in place with Georgia's higher education institutions.

Interviews. The data collected by the interviews will correlate with the data collected on each agency and institution. Comparisons will be made from the sample group against all the published data gathered on institutions within Georgia. This will provide triangulation between the various forms of data collected and guard against any misinterpretations of the published data.

Summary. Together the four levels of data collection are designed to provide analysis from the national level through regional review to the higher educational institutional practices taking place within the State of Georgia. This design will permit comparison of the various levels of governance and action showing the quality, control, and comparable credit hour use between the various levels and between the various institutions.

6. Anticipated duration of participation. a. Number of visits or contacts: 10
b. Length of each visit: 1 hour
c. Total duration of participation: 10 hours

Section J: DATA COLLECTION INSTRUMENTS

List and describe all the instruments (interview guides, questionnaires, surveys, etc.) to be used for this study. Attach a copy of all instruments that are properly identified and with corresponding numbers written on them. *To add a row, bring cursor to outside of last row, and press "enter" key.*

Number	Instrument	Brief Description	Identify group(s) that will complete
1	Structured Interview	Interview questions	Academic administrative personnel from GA colleges and universities

Section K: RISKS AND BENEFITS

1. Risks and/or discomforts

Describe any reasonably foreseeable psychological, social, legal, economic or physical risks and/or discomforts from all research procedures, and the corresponding measures to minimize these. ***Important Note:*** *If there is more than one study procedure, please identify the procedure followed by the responses for both (a) and (b).*

a. Risks and/or discomforts. Minimal

b. Measures to minimize the risks and discomforts to participants. Coding transcripts to remove information that may identify person and secured storage of all project files.

2. Benefits

a. Describe any potential direct benefits to study participants. If none, indicate so. ***Important Note:*** *Please do not include compensation/payment/extra credit in this section, as these are "incentives" and not "benefits" of participation in research; any incentives must be described in Section G.4.* None

b. Describe the potential benefits to society or humankind. It is hoped that this research will influence higher education policies and practices to address the growing need to change current administrative structures to meet modern day online education demands and learners.

3. Risk/Benefit Analysis

a. Indicate how the risks to the participants are reasonable in relation to anticipated benefits, if any, to participants and the importance of the knowledge that may reasonably be expected to result from the study *(i.e., How do the benefits of the study outweigh the risks, if not directly to the participants then to society or humankind?).* N/A

4. Sensitive or Illegal Activities

a. Will study collect any information that if disclosed could potentially have adverse consequences for participants or damage their financial standing, employability, insurability, or reputation *(includes but not limited to sexual attitudes, preferences, or practices; HIV/AIDS or other sexually transmitted diseases; use of alcohol, drugs, or other addictive products; illegal conduct; an individual's psychological well-being or mental health; and genetic information)***?**

No

b. If yes, explain how the researchers will protect this information from any inadvertent disclosure.

5. Reportable Information

a. Is it reasonably foreseeable that the study will collect or be privy to information that State or Federal law requires to be reported to other officials (e.g., child or elder abuse) **or ethically might require action** (e.g., suicidal ideation, intent to hurt self or others)**?** No

b. If yes, please explain and include a discussion of the reporting requirements in the consent document(s).

Section L: DATA SECURITY AND FUTURE USE OF INFORMATION

1. Data Security

Check the box that applies.

☐ **Anonymous –** The data and/or specimens will not be labeled with any individually-identifiable information (e.g., name, SSN, medical record number, home address, telephone number, email address, etc.), or labeled with a code that the research team can link to individually-identifiable information.

☒ **Confidential –** The responses/information may potentially be linked/traced back to an individual participant, for example, by the researcher/s (like in face-to-face interviews, focus groups). **If necessary, provide additional pertinent information.** Coding of transcripts to remove peronsal identifiers. Related soft and hard files will also be coded. All research materials will be securley stored.

☒ **Confidential – Indirect identifiers.** The data and/or specimens will be labeled with a code that the research team can link to individually-identifiable information. If the data and/or specimens will be coded, describe below how the key to the code will be securely maintained.

- ☒ **Paper records will be used.** The key to the code will be secured in a locked container (such as a file cabinet or drawer) in a locked room. The coded data and/or specimens will be maintained in a different location.
- ☒ **Computer/electronic files will be used.** The key to the code will be in an encrypted and/or password protected file. The coded data file will be maintained on a separate computer/server.
- ☐ **Other (please specify), or provide additional pertinent information.**

☐ **Confidential – Direct Identifiers.** The data and/or specimens will be directly labeled with the individually-identifiable information.

- ☐ **Paper records will be used.** The information will be secured in a locked container (such as a file cabinet or drawer) in a locked room.
- ☐ **Computer/electronic files will be used.** The information will be stored in an encrypted and/or password protected file.
- ☐ **Other (please specify), or provide additional pertinent information.**

If "Confidential" is marked, please answer all the following:

Explain why it is necessary to keep direct or indirect identifiers. Part of the research design is to learn with Georgia higher education institutions has credit hour policies and/or practices that provide the translation of nontraditional class structures into credit hour equivalence. It is necessary to associate data with its specific institution. It is not necessary to associate the interviewee with the specific data. Therefore, coding of files and data will be used.

Identify who will have access to the individually-identifiable information and/or the key to the code. Researcher

☐ **Public. Information will be individually-identifiable when published, presented, or made available to the public.**

2. Future Use of Information

If individually-identifiable information and/or codes will be retained after completion of data collection, describe how the information will be handled and stored to ensure confidentiality. ***Check all that apply.***

- ☐ **All data files will be stripped of individually-identifiable information and/or the key to the code destroyed.**
- ☐ **All specimens will be stripped of individually-identifiable information and/or the key to the code destroyed.**

☒ **Individually-identifiable information and/or codes linking the data or specimens to individual identifiers will be retained.** ***If this box is checked, describe:***

a. Retention period. **10 years**

b. Justification for retention. **This research is foundational to continued research on credit hour use and values. It may be necessary to refer to this specific project's data for future projects and reports/publications. Identifiers to any specific person will only be by use of codes. Identifiers will only be used to correlate data with specific institutions and agencies.**

c. Procedure for removing or destroying the direct/indirect identifiers, if applicable. **All data files will be stripped of any personal identifiers when data is deemed no longer valuable to future work.**

☐ **Audio and/or video recordings (if applicable) will be transcribed/analyzed and then destroyed or modified to eliminate the possibility that study participants could be identified.**

☒ **Audio and/or video recordings (if applicable) will be retained.** ***If this box is checked, describe:***

a. Retention period. **10 years**

b. Justification for retention. **This research is foundational to continued research on credit hour use and values. It may be necessary to refer to this specific project's data for future projects and reports/publications. Identifiers to any specific person will only be by use of codes. Identifiers will only be used to correlate data with specific institutions and agencies. All data files will be stripped of any personal identifiers when data is deemed no longer valuable to future work.**

☐ **Other (please specify), or provide additional pertinent information.**

Section M: CONSENT PROCESS

Important Note: *The IRB strongly recommends the use of consent templates that are available on the IRB website to ensure that all the elements of informed consent are included (per 45 CFR 116). If more than one consent document will be used, please name each accordingly.*

☒ **The PI is attaching a copy of all consent documents that participants will sign.**

☐ **The PI is requesting that the IRB waive requirement to document informed consent.** A signed consent form may be waived if one of the following criteria is met, ***check the box that applies.***

☐ 1. The only record linking the participant and the research would be the consent document and the principal risk would be potential harm resulting from a breach of confidentiality. Each participant will be asked whether the participant wants documentation linking the participant with the research, and the participant's wishes will govern; or

☐ 2. The research presents no more than minimal risk of harm to participants and involves no procedures for which written consent is normally required outside of the research context.

The consent script or cover letter that will be used in lieu of a consent form is attached. (Choose YES or NO)

☒ **The PI is requesting that the IRB approve a consent procedure which does not include, or which alters, some or all of the elements of informed consent set forth in 45 CFR 116, or waive the requirement to obtain informed consent.** An informed consent may be waived if the IRB finds that all of the following have been met:

1. The research involves no more than minimal risk to the participants;
2. The waiver or alteration will not adversely affect the rights and welfare of the participants;
3. The research could not practicably be carried out without the waiver or alteration; and,
4. Whenever appropriate, the participants will be provided with additional pertinent information after participation.

Provide justification for requesting a waiver. It may be necessary to conduct interviews over telephone. If so, participant consent will be optained using email. An email with the consent text placed in the body of the email to the participant. The participant will be asked to select, copy, and paste in a return email the phrase: "I understand that I am agreeing by my return email to take part in this research project and understand that I will retain my copy of this email consent for my records." The return email will be printed and an electronic copy will be kept with secured research files.

Describe how, where, and when informed consent will be obtained from research participants (or permission from parent/s or guardian/s and assent from minor participants), if applicable. N/A

Section N: VULNERABLE AND/OR SPECIAL POPULATIONS

1. **Check if some or all of the targeted participants fall into the following groups.** ***Important Note:*** *Some targeted populations require compliance with additional Subparts and the completion of an Appendix or of specific section (see last column).*

Population Type	Required to Complete
☐ **Pregnant women, neonates, or fetuses**	Appendix for Subpart B
☐ **Prisoners**	Appendix for Subpart C
☐ **Minors**	
☐ **Mentally-disabled/cognitively-impaired/severe psychological disorders**	
☐ **Physically-disabled**	
☐ **Terminally ill**	
☐ **Economically/educationally-disadvantaged**	
☐ **A specific group based on religion, race, ethnicity, immigration status, language, or sexual orientation**	
☐ **UGA Psychology Research Pool/Other UGA students/employees**	
☐ **Other** (please describe)	

2. **Explain justification for including the group(s) checked above in this particular study.**
3. **Is there a working relationship between any researchers and the participants** (e.g., PI's own students or employees)**?**
   No
   a. If yes, please describe.
4. **Describe any additional safeguards to protect the rights and welfare of these participants and to minimize any possible coercion or undue influence.** *For example, amount of payment will be non-coercive for the financially disadvantaged, extra-careful evaluations of participants' understanding of the study, advocates to be involved in the consent process, or use flyers to recruit participants instead of directly approaching own staff or students.*

Section O: COLLABORATIVE PROJECT OR OUTSIDE PERFORMANCE SITE

Check <u>one of the two</u> boxes below:

☒ **This project does not involve any collaboration with non-UGA researchers or performance in non-UGA facilities.**

☐ **This project involves collaboration with non-UGA researchers or performance in non-UGA facilities** (e.g., local public school, participants' workplace, hospital)**.** ***<u>If this box is checked</u>, list <u>all</u> sites at which you will conduct this research.*** **Attach authorization/permission and/or current IRB approval.** *Checkboxes below are not clickable so place "X" before or over the box. To add a row, bring cursor to outside of last row, press "enter" key, and copy/paste the previous cells.*

Name of Institution	Location (County/State/Country)	Authorization/permission letter and/or current IRB approval.
		☐ Attached ☐ Pending
		☐ Attached ☐ Pending

<u>IMPORTANT NOTE:</u> **<u>If none of the following applies to your research, this is the END of the application form.</u>**

Section P: METHODS AND PROCEDURES THAT REQUIRE ADDITIONAL INFORMATION

Check all that apply. ***Important Note:*** *The items listed below are* ***NOT*** *an inclusive list of methods and procedures that may be used in research studies. Some procedures require the completion of an Appendix or of specific sections (see last column).*

Method/Procedure	Required to Complete
☒ **Student research (For student's thesis/dissertation/others)**	Section Q (below)
☐ **Deception, concealment, or incomplete disclosure**	Section R (below)
☐ **Internet research**	Section S (below)
☐ **Blood sampling/collection**	Section T (below)
☐ **Clinical trial (Drugs, biologics, or devices)**	

☐ **Genetic analyses**
☐ **Data/Tissue repository**
☐ **HIPAA (Protected health information)**
☐ **DXA/X-RAY**
☐ **MRI/EEG/ECG/NIRS/Ultrasound**
☐ **Other** (please describe)

Section Q: STUDENT RESEARCH

Important Note: *The IRB recommends submission for IRB review only after the appropriate committee has conducted the necessary scientific review and approved the research proposal.*

1. This application is being submitted for: ☐ Undergraduate Honors Thesis ☒ Doctoral Dissertation Research ☐ Masters Thesis Research ☐ Other (please describe)

2. Has the student's thesis/dissertation committee approved this research? ☒ **Yes** ☐ **No**

Section R: DECEPTION, CONCEALMENT, OR INCOMPLETE DISCLOSURE

1. Describe the deception, concealment, or incomplete disclosure; explain why it is necessary, and how you will debrief the participants. ***Important Note:*** *The consent form should include the following statement: "In order to make this study a valid one, some information about (my participation or the study) will be withheld until completion of the study."*

2. Debriefing Form is attached. ☐ **Yes** ☐ **No;** If no, please explain.

Section S: INTERNET RESEARCH

If data will be collected, transmitted, and/or stored via the internet, the level of security should be appropriate to the level of risk. Indicate the measures that will be taken to ensure security of data transmitted over the internet. *Check all that apply.*

☐ A mechanism will be used to strip off the IP addresses for data submitted via e-mail.
☐ The data will be transmitted in encrypted format.
☒ Firewall technology will be used to protect the research computer from unauthorized access.
☒ Hardware storing the data will be accessible only to authorized users with log-in privileges.
☐ Other (please describe), or provide additional pertinent information.

Section T: BLOOD SAMPLING / COLLECTION

If blood will be collected for the purpose of this research, please respond to all the following:

1. **Route/method of collection** (e.g., by finger stick, heel stick, venipuncture)**:**
2. **Frequency of collection** (e.g., 2 times per week, for 3 weeks)**:**
3. **Volume of blood for each collection** (in milliliters)**:**
4. **Total volume to be collected** (in milliliters)**:**
5. **Are participants healthy, non-pregnant adults who weigh at least 110 pounds?** (Choose YES or NO)
   a. If no, indicate if amount collected will exceed the lesser of 50 ml or 3 ml per kg in an 8-week period and if collection will occur more frequently than 2 times per week.
6. **Will participants fast prior to blood collection(s)?** (Choose YES or NO)
   a. If yes, describe how informed consent will be obtained prior to fasting.

Fred Prasuhn <fprasuhn@gmail.com>

Project Review - Cervero/Prasuhn

Mon, May 3, 2010 at 4:29 PM

Benilda Pooser <bpooser@uga.edu>
To: "rcervero@uga.edu" <rcervero@uga.edu>
Cc: "fprasuhn@uga.edu" <fprasuhn@uga.edu>

PROJECT NUMBER: 2010-10748-0
TITLE OF STUDY: Virtual Seat Time: Translating Online Education "Class Time" Into Credit Hours
PRINCIPAL INVESTIGATOR: Dr. Ronald M. Cervero
CO-PRINCIPAL INVESTIGATOR: Mr. Frederick C. Prasuhn

Dear Dr. Cervero and Mr. Prasuhn,

The University of Georgia (UGA) Human Subjects Office has reviewed the above-titled study and determined that the proposed data collection, which focuses on institutional policies and guidelines related to the topic of this research, does not meet the definition of *human subjects* under Title 45 CFR 46.102. This project, therefore, does not require review and approval by the UGA Institutional Review Board (IRB); you may now begin this study. Please keep this email for your records.

This opinion covers only this request and does not include any other future research or activity that may involve human participants. Please notify our office if the project changes to assure that these changes do not affect the original determination.

Good luck with the study, and please feel free to contact our office for any research endeavors involving human subjects that you may be conducting in the future.
Best regards,

Benil
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Benilda P. Pooser, Ph.D., CIM
Director, Human Subjects Office
629 Boyd Graduate Studies Research Center
University of Georgia
Athens, GA 30602-7411
Telephone: 706-542-3199
Fax: 706-542-3360
http://www.ovpr.uga.edu/hso/

APPENDIX M

USNEI CREDIT HOUR VALUES PRE-PROGRAM INTEGRITY

APPENDIX M

USNEI Credit Hour Values Pre-Program Integrity

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Lecture 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Lecture 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs
Seminar 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Seminar 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs
Laboratory 1 credit	1 hr	2 hrs	1-2 hrs	15 hrs	30 hrs	15-30 hrs	60-75 hrs
Laboratory 3 credits	3 hrs	6 hrs	3-6hrs	45 hrs	90 hrs	45-90 hrs	180-255 hrs
Other[e] 1 credit	3-4 hrs independent and/or supervised work			45-60 hrs independent and/or supervised work			45-60 hrs
Other[e] 3 credits	9-12 hrs independent and/or supervised work			135-180 hrs independent and/or supervised work			135-180 hrs
12-Hour Rule		12 hrs			180 hrs		180 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra

work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include practice, independent study, studio, and internship. Created from U.S. Network for Education Information. (2008). *Structure of the U.S. education system: Credit systems*. Washington, DC: U.S. Department of Education. Retrieved April 10, 2010 from http://www2.ed.gov/about/offices/list/ous/international/usnei/us/credits.doc.

APPENDIX N

POST PROGRAM INTEGRITY CREDIT HOUR VALUES

APPENDIX N

Post Program Integrity Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Equivalent work 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Equivalent work course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs
Equivalent work other 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Equivalent work other course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include practice, independent study, studio, and internship. Created from *Program Integrity Issues: Final Rule*, 75 Fed. Reg. 66,890 (2010) (to be codified at 34 C.F.R. pts. 600.2, 602.24, 603.24, and 668.8); and Ochoa, E. M. (2011). *Dear Colleague Letter*. (GEN-11-06). Washington, DC: U.S. Department of Education. Retrieved March 4, 2011 from http://ifap.ed.gov/dpcletters/attachments/GEN1106.pdf.

APPENDIX O

DEAR COLLEAGUE LETTER

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

THE ASSISTANT SECRETARY

MAR 1 8 2011

GEN-11-06

Subject: Guidance to Institutions and Accrediting Agencies Regarding a Credit Hour as Defined in the Final Regulations Published on October 29, 2010

Dear Colleague:

On October 29, 2010, the Department published in the Federal Register final regulations on program integrity issues (75 FR 66832). This letter provides information concerning the definition of a credit hour and guidance on implementing these final regulations. We are providing this letter to highlight the flexibilities inherent in the definition and to correct misunderstandings circulating in the higher education community. We expect to provide further information on other provisions of the program integrity regulations in "Dear Colleague Letters" in the coming weeks.

The definition of a credit hour for Federal purposes is necessary, in part, because more than $150 billion of Federal financial aid is awarded annually based on an individual student's enrollment, as represented in number of credits. The credit hour is a basic unit of student aid eligibility, and the new regulations address vulnerabilities in the student aid programs that leave them open to fraud and abuse. However, the regulations are grounded in commonly accepted practice in higher education, do not intrude on core academic decisions made by institutions and their accrediting agencies, and are completely consistent with innovative practices such as online education, competency-based credit, and academic activities that do not rely on "seat time."

The regulations reflect the Department's responsibility to taxpayers to ensure value for their investment, while respecting recognized accrediting agencies as the "reliable authorities regarding the quality of education or training offered by the institutions or programs they accredit." Significantly, these regulations were developed only after the Department's Inspector General conducted reviews at three of the seven regional accrediting agencies and found the oversight of institutional assignment of credit hours insufficient at all three agencies. These three agencies accounted for more than 70 percent of the Federal student aid funds awarded in 2009-10. The potential for a small number of unscrupulous institutions to exploit this lack of minimum standards led the Department to regulate in this manner to safeguard taxpayer funds.

Credit-hour definition

The October 29 regulations included a definition of a credit hour under 34 CFR 600.2 (Enclosure A) for purposes of Federal programs and provisions related to accrediting agencies' assessment of institutions' determinations of credit hours or other measures of student work under 34 CFR 602.24(f) for purposes of the title IV student financial assistance programs. In addition, the regulations revised paragraph (l) of the title IV program clock-to-credit-hour requirements in 34 CFR 668.8(k) and (l) that may be applicable to a nondegree, undergraduate program.

A credit hour for Federal purposes is an institutionally established equivalency that reasonably approximates some minimum amount of student work reflective of the amount of work expected in a Carnegie unit: key phrases being "institutionally established," "equivalency," "reasonably approximates," and "minimum amount."

A credit hour is a unit of measure that gives value to the level of instruction, academic rigor, and time requirements for a course taken at an educational institution. At its most basic, a credit hour is a proxy measure of a quantity of student learning. The higher education community has long used the credit hour, as defined by the Carnegie unit, as part of a process to establish a standard measure of faculty workloads, costs of instruction, and rates of educational efficiencies as well as a measure of student work for transfer students.

In keeping with the original purpose of providing a consistent measure of at least a minimum quantity of a student's academic engagement, the definition of a credit hour will establish a basis for measuring eligibility for Federal funding. This standard measure will provide increased assurance that a credit hour has the necessary educational content to warrant the amounts of Federal funds that are awarded to participants in Federal funding programs, and that students at different institutions are treated equitably in the awarding of those funds.

We recognize, however, that other measures of educational content are being developed by institutions, and we do not intend to limit the methods by which an institution may measure a student's work in his or her educational activities. We, therefore, are explicitly providing institutions the flexibility to demonstrate alternative methods of measuring student learning, so long as they result in institutional equivalencies that reasonably approximate the definition of a credit hour for Federal purposes.

Flexibility for institutions

An institution is responsible for determining the credit hours awarded for coursework in its programs in accordance with the definition of a credit hour for Federal program purposes. These credit hours are used to determine the eligibility of the institution and its educational programs for participation in Federal programs. As required under the Higher Education Act of 1965, as amended (HEA), they are also a measure of student work used by an institution to determine the eligibility of a student for Federal student assistance and the amount of the student's assistance.

The definition provides several critical flexibilities for institutions in determining the appropriate amount of credit hours for student coursework:

- The institution determines the amount of credit awarded for student work. It is up to institutions to gain the confidence through peer review in the accreditation process that their credit hour policies and practices consistently meet conventional academic expectations.
- A credit hour is expected to be a reasonable approximation of a minimum amount of student work in a Carnegie unit in accordance with commonly accepted practice in higher education. It is important to note that there is no requirement that a credit hour *exactly* duplicate the amount of work in paragraph (1) of the definition, as is highlighted by the

provisions of paragraph (2). The requirement is that a credit hour *reasonably approximate* that minimum amount of work in paragraph (1).

- The credit hour definition is a minimum standard that does not restrict an institution from setting a higher standard that requires more student work per credit hour.
- The definition does not dictate particular amounts of classroom time versus out-of-class student work.
- In determining the amount of work the institution's learning outcomes will entail, as under current practice, the institution may take into consideration alternative delivery methods, measurements of student work, academic calendars, disciplines, and degree levels.
- To the extent an institution believes that complying with the Federal definition of a credit hour would not be appropriate for academic and other institutional needs, it may adopt a separate measure for those purposes.

The intent of these flexibilities is to recognize the differences across institutions, fields of study, types of coursework, and delivery methods, while providing a consistent measure of student work for purposes of Federal programs.

The credit hour definition does not emphasize the concept of "seat time" (time in class) as the primary metric for determining the amount of student work for Federal purposes. Institutions may assign credit hours to courses for an amount of work represented by verifiable student achievement of institutionally established learning outcomes. Credits may be awarded on the basis of documentation of the amount of work a typical student is expected to complete within a specified amount of academically engaged time, or on the basis of documented student learning calibrated to that amount of academically engaged time for a typical student. Thus, the definition for Federal purposes represents nothing new in this regard.

Accrediting agency responsibilities

While not part of the definition of a credit hour, the final regulations also require an accrediting agency to conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours used for Federal program purposes. The accrediting agency--

- Must review the institution's policies and procedures for determining the credit hours and the application of the institution's policies and procedures to its programs and coursework;
- Must make a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education;
- May review and evaluate an institution's policies and procedures for determining credit hour assignments through use of sampling or other methods in the evaluation; and
- Must take such actions that it deems appropriate to address any deficiencies that it identifies at an institution, as it does in relation to other deficiencies it may identify, subject to the requirements of 34 CFR part 602.

An agency must promptly notify the Secretary if it finds systemic noncompliance with the agency's policies, or significant noncompliance regarding one or more programs at the institution.

These same responsibilities apply to the State agencies -- currently New York, Pennsylvania, Oklahoma, and Puerto Rico -- that are recognized by the Secretary under 34 CFR part 603 as reliable authorities regarding the quality of public postsecondary vocational education in their States.

Implementation

Institutions and accrediting agencies are responsible for properly implementing the credit hour regulatory requirements that are effective July 1, 2011. The Secretary understands that institutions and accrediting agencies face challenges in implementing these new requirements. For the 2011-2012 award year, as long as an institution or accrediting agency is in the process of complying with these provisions, we will consider the institution or accrediting agency to be making a good-faith effort to comply, and Department staff will take this effort into consideration when reviewing an institution's or accrediting agency's implementation of the regulations. Accrediting agencies and State approval agencies whose written policies, procedures, criteria, and materials are not finalized prior to July 1, 2011, may make reasonable allowances in their review of institutions during the 2011-2012 award year.

Additional information

Enclosure A provides the regulatory language and additional questions and answers. Enclosure B provides, for accrediting agencies, a "Supplement to *Guidelines for Preparing/Reviewing Petitions and Compliance Reports* Addressing New Credit Hour Regulations."

Please direct any questions to Kay Gilcher at kay.gilcher@ed.gov or (202) 502-7693, or to Fred Sellers at fred.sellers@ed.gov or (202) 502-7502.

Thank you for your participation in this important work.

Sincerely,

Eduardo M. Ochoa

Enclosures

Enclosure A

Regulatory Language

In 34 CFR 600.2 of the final regulations, we defined a credit hour for Federal programs, including the Federal student financial assistance programs, as--

> An amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than:
>
> 1. One hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or
> 2. At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution, including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

In the case of a program subject to the clock-to-credit-hour conversion requirements, institutions must determine the credit hours to be awarded for coursework under those requirements. (See 34 CFR 668.8(k) and (l).)

Questions and Answers

Credit hour

Q1. Must an institution use the Federal definition of a credit hour as a starting point for making academic judgments about the credits associated with courses and programs if the institution is to continue to be eligible for Federal funding such as student aid?
A1. No. As discussed in the preamble of the final regulations (see 75 FR 66845, available at http://edocket.access.gpo.gov/2010/pdf/2010-26531.pdf), nothing in the regulations prevents an institution from defining a credit hour using other metrics or measures of student progress and learning outcomes for academic and other non-Federal purposes, so long as it is also awarding Federal student aid using the credit hour definition in the regulations. An institution may have courses measured in Federal credit hours and also in institutional credit hours. Use of the Federal credit hour definition is only required for Federal program purposes, for example, determining enrollment status in order to determine Federal student aid eligibility for a student. However, we believe the definition is flexible enough to meet institutional needs as well as Federal needs.

Q2. Can an institution comply using a measure of student progress and learning outcomes other than a credit hour?

A2. Yes. An institution may use other measures to the extent the institution determines reasonable equivalencies to a credit hour of student work. For example, the Department continues to provide for the utilization of direct assessment of student learning under 34 CFR 668.10 in lieu of credit hours in a Department-approved direct assessment program, as long as an institution establishes a methodology to reasonably equate the direct assessment to credit hours.

Q3. Does the definition of a credit hour mean that all 3-credit courses will have to meet for 3 hours per week or the equivalent of 37.5 clock hours for a semester hour?
A3. No. The credit-hour definition does not dictate particular amounts of classroom time versus out-of-class student work. Further note that the definition provides that a credit hour may be for an equivalent amount of work over a different amount of time.

There is no requirement that a 3-semester hour course meet 3 hours per week during a semester or a 3-quarter-hour course meet 3 hours per week during a quarter. The requirement is that the institution determine that there is an amount of student work for a credit hour that reasonably approximates not less than one hour of class and two hours of out-of-class student work per week over a semester for a semester hour or a quarter for a quarter hour. For example, an institution with a semester-based calendar has a graduate seminar for which it awards 3 semester hours. The class meets only one hour per week over a 15-week semester with the students expected to perform a substantial amount of outside research that is the equivalent of 8 or more hours of student work each week of the semester. For purposes of the Federal definition, the institution would be able to award up to 3 semester hours for the course.

With regard to the need to have the equivalent of 37.5 hours, the 37.5-hour requirement relates to undergraduate programs subject to the clock-to-credit-hour conversion requirements in §668.8(k) and (l). These requirements are not relevant to degree programs of at least two academic years and graduate programs, and would not apply to certain nondegree undergraduate programs. Further, similar to the definition of a credit hour in §600.2, §668.8(l)(2) provides institutions with the flexibility to take into account out-of-class student work in determining the credit hours that may be used for Federal purposes.

Q.4. How would an institution apply the definition of a credit hour if the institution offers asynchronous online courses that are not also offered in a classroom setting?
A.4. There is no "seat time" requirement implicit in the definition of a credit hour. An institution that is offering asynchronous online courses would need to determine the amount of student work expected in each online course in order to achieve the course objectives, and to assign a credit hour based on at least an equivalent amount of work as represented in the definition of credit hour.

Q.5. What is the relationship of a defined credit hour to a “week of instructional time” as defined under §668.3(b)(2) and used in determining the weeks of instructional time for purposes of an educational program and student eligibility?

A.5. In general, a week of instructional time is any seven-day period in which at least one day of regularly scheduled instruction or examination occurs; instructional time does not include vacation time, homework, or periods of counseling or orientation. Thus, in any seven-day period, a student is expected to be academically engaged through, for example, classroom attendance, examinations, practica, laboratory work, internships, and supervised studio work. In the case of distance education and correspondence education, academic engagement would include, but not be limited to, submitting an academic assignment; taking an exam, an interactive tutorial, or computer-assisted instruction; attending a study group that was assigned by the institution; contributing to an academic online discussion; and initiating contact with a faculty member to ask a question about the academic subject studied in the course. Merely logging into the electronic classroom does not constitute academic engagement.

Even though a student's homework, research, or other unsupervised student work is not considered in determining the weeks of instructional time in an educational program, such student work would be considered in determining the number of credits to be awarded for a student's coursework. (Note: we believe that financial aid administrators are familiar with these and other title IV student financial aid concepts. Academic personnel are encouraged to consult with their financial aid staff to gain a better understanding of how credit hours factor into the administration of title IV funds.)

Q.6. Must an institution have a single policy and procedures related to the credit hour that applies to all disciplines, degree levels, teaching/learning formats, and delivery modes?
A.6. No. We recognize that complex institutions with multiple degree levels may not have rigidly uniform policies and procedures related to the credit hour across a variety of disciplines, degree levels, teaching/learning formats, and delivery modes. However, institutions must have policies and procedures that ensure sufficient consistency to gain the confidence of accrediting agencies through peer review that their assignment of credit hours conforms to commonly accepted practice in higher education.

Q.7. Can you provide an example of an institution using different credits for title IV purposes and for academic purposes?
A.7. Institution A uses the term "credit hour" in describing a course, but awards credits for that course solely on the basis of classroom time without any expectation of student work outside of the classroom. For example, the institution awards 3 credit hours for a course that meets 3 hours per week over a semester. For Federal purposes, the course is a one credit hour course.

Q.8. If an institution measures student progress in courses or in units, rather than in credits, is the institution required to change its practices and offer 3-credit courses?
A.8. No. The institution may continue its current practice of measuring progress in courses or in units. However, the institution must award Federal student aid using the credit hour definition in the regulations.

Accrediting agencies (also see Enclosure B)

Q.9. What is the role of accrediting agencies in reviewing an institution's implementation of the clock-to-credit-hour conversion formula under §668.8 (l)?
A.9. An accrediting agency is responsible, as part of its analysis of an institution under §602.24(f), for ensuring that the institution is complying with the requirements in §668.8(l)(2) when determining the amount of student work outside of class used to convert the clock hours for the educational activities in a program, and that the conversion results are compliant with the definition of a credit hour in §600.2.

Q.10. An institution restructures a 720-clock-hour undergraduate program that has no out-of-class student work and is subject to the clock-to-credit-hour conversion. Under current regulations, the program is considered a 24-semester-hour program for title IV student financial assistance purposes. The institution is restructuring the program to increase the clock hours in the program to 900 clock hours in order to continue to support the 24 semester hours previously awarded and to provide eligibility under the October 29 regulations for Federal student assistance at the previous level. What is the responsibility of the accrediting agency?
A.10. The conversion of the 900 clock hours to 24 semester hours is appropriate under the conversion standard of 37.5 clock hours per semester hour under §668.8(l)(1) of the October 29 regulations. However, the accrediting agency must review this restructuring as a substantive change because the addition of these clock hours constitutes a substantial increase in the number of clock hours awarded for successful completion of the program. Similarly, accrediting agencies are responsible for ensuring that the credit hours determined by an institution making a conversion based on out-of-class student work under §668.8(l)(2) conform to the definition of a credit hour in §600.2.

Role of States

Q.11. Do the regulations add a requirement that, to authorize an institution, a State must review and evaluate the institution's policies and procedures for the assignment of credit hours, and the institution's application of its policies and procedures in assigning credit hours to its programs and courses?
A.11. No. The regulations do not regulate States, and they do not require that a State review and evaluate every institution's assignment of credit hours. Only for those public postsecondary vocational institutions in New York, Pennsylvania, Oklahoma, and Puerto Rico that participate in the Federal student assistance programs based on State approval in lieu of accreditation by a nationally recognized accrediting agency, will the recognized State agency be required to perform such an assessment of those institutions' assignment of credit hours. (See 34 CFR 603.24(c) of the October 29 regulations.)

Enclosure B

Supplement to
Guidelines for Preparing/Reviewing Petitions and Compliance Reports
Addressing New Credit Hour Regulations
Subject to Revision Based on Public Comment
For Use During the 2011-2012 Review Cycle

Effective July 1, 2011

General Guidance on §602.24(f)
Accrediting agencies whose accreditation can enable an institution to be eligible to seek participation in title IV, HEA programs are expected to assess institutions to determine if they have made credit hour determinations for title IV, HEA program purposes that meet at least the minimum standards in the definition of a credit hour in §600.2 (see boxed text below), in light of commonly accepted practice in higher education. The regulations do not preclude an institution using other metrics for determining credit hours or other measures of student work for academic and other non-Federal purposes.

Institutions are responsible and accountable for demonstrating that each course has the appropriate amount of student work for students to achieve the level of competency (i.e., learning outcomes) defined by institutionally established course objectives. Institutions are accountable for assigning an amount of title IV credit hours for each course that corresponds to the quantity of work reasonably expected to be required in order to achieve those learning outcomes, and for documenting student achievement of those objectives. Institutions must assign credit hours in a way that complies with measures in §600.2 and that conforms with commonly accepted practice in higher education.

Accrediting agencies are not expected to review every course and related documentation of learning outcomes; rather, the agency's review is of the policies and procedures the institution uses to assign credit hours, with the application verified by a sampling of the institution's degree and nondegree programs to encompass a variety of academic activities, disciplines, and delivery modes. During the 2011-2012 review cycle, the Department will use the experience of reviewing agency submissions to develop and disseminate models through updates to this guidance that agencies could rely on to meet this requirement. However, the use of such models would not be mandated. and, instead, the Department will work with agencies to adopt approaches that best fit the institutions that the agency accredits.

Accrediting agencies are not required to mandate specific policies for institutions with regard to assigning credit hours to programs and coursework. Since the regulations establish a minimum standard, and institutions may choose to include more work for their credit hours than the minimum amount, credit hours at one institution will not necessarily equate to credit hours at another institution for a similar program.

§600.2 Definitions

Credit hour: Except as provided in 34 CFR 668.8(k) and (l), a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—

(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or

(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution, including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

A credit hour for Federal purposes is an institutionally established equivalency that reasonably approximates some minimum amount of student work reflective of the amount of work expected in a Carnegie unit: key phrases being "institutionally established," "equivalency," "reasonably approximate," and "minimum amount." Further, the definition does not dictate particular amounts of classroom time versus out-of-class student work, and an institution may use alternative delivery methods, measurements of student work, or academic calendars to determine intended learning outcomes and verify evidence of student achievement. To the extent an institution believes that complying with the Federal definition of a credit hour would not be appropriate for academic and other institutional needs, it may adopt a separate measure for those purposes.

The credit hour definition in §600.2 does not apply directly to nondegree, undergraduate programs that are subject to the title IV clock-to-credit-hour conversion requirements as described in 34 CFR 668.8(k) and (l). However, there is a linkage in that, under §668.8(l)(2), if a nondegree program is subject to the conversion requirements, the institution may convert by assigning a number of clock hours to each credit hour that is less than the basic minimum required number of clock hours of instruction otherwise required, e.g., at least 37.5 clock hours per semester hour, if the accrediting agency's analysis of the institution under §602.24(f) identifies no deficiencies in the institution's assignment of credit hours and if the institution complies with certain additional requirements in §668.8(l)(2) when there is student work outside of class. In any case, the number of clock hours of instruction must be at least 30 clock hours per semester or trimester hour or 20 clock hours per quarter credit hour. In determining the appropriate

conversion rates under §668.8(l)(2), the institution identifies the amount of work outside of class for various educational activities in a course or program. (For reference, the text of §668.8(k) and (l) is provided at the end of this section.)

§602.24 Additional procedures certain institutional accreditors must have. If the agency is an institutional accrediting agency and its accreditation or preaccreditation enables those institutions to obtain eligibility to participate in title IV, HEA programs, the agency must demonstrate that it has established and uses all of the following procedures:

* * * * *

(f) Credit hour policies. The accrediting agency, as part of its review of an institution for initial accreditation or preaccreditation or renewal of accreditation, must conduct an effective review and evaluation of the reliability and accuracy of the institution's assignment of credit hours.

(1) The accrediting agency meets this requirement if--

(i) It reviews the institution's--

(A) Policies and procedures for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for courses and programs; and

(B) The application of the institution's policies and procedures to its programs and coursework; and

(ii) Makes a reasonable determination of whether the institution's assignment of credit hours conforms to commonly accepted practice in higher education.

(2) In reviewing and evaluating an institution's policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in evaluation, sufficient to comply with paragraph (f)(1)(i)(B) of this section.

Review Elements:
In assessing this area, Department staff looks to see if the agency discussed and demonstrated that—

- It has written policy and procedures that address the review and evaluation of the institution's assignment of credit hours as defined for Federal program purposes.
- The agency's procedures include criteria for assessing an institution's assignment of credit hours, adequacy of the institutionally-identified policies and procedures, and evidence of an accurate, reliable application provided by the institution.

- The agency makes a reasonable determination whether the institution's policies and procedures result in the establishment of credit hours for title IV, HEA program purposes that meet at least the minimum standards in the definition in 34 CFR 600.2 and that conform to commonly accepted practice in higher education.
- The agency's review processes encompass a varied sample of the institution's degree and nondegree programs in terms of academic discipline, level, delivery modes, and types of academic activities. It is important to note that an agency's review does not need to look at all courses.
- If its procedures include sampling to determine credit hour assignments, the agency provides guidance to site review teams on selecting a sample that adequately encompasses a variety of disciplines, degree levels, teaching/learning formats, and delivery modes.
- In reviewing academic activities other than classroom or direct faculty instruction accompanied by out-of-class work, the agency determines whether an institution's processes and procedures result in the establishment of reasonable equivalencies for the amount of academic work described in paragraph (1) of the credit hour definition within the framework of acceptable institutional practices at comparable institutions of higher education for similar programs, including undergraduate programs subject to the clock-to-credit-hour conversion requirements under §668.8(l).

Typical Documentation:
In addressing this area, suggested documentation may include the following types of items, as appropriate—

- The agency's written policy, procedures, and criteria for reviewing institutions' assignment of credit hours to programs and coursework for title IV purposes.
- Sample self-study(ies) demonstrating the institution's policies and procedures for assigning credit hours to programs and coursework.
- Excerpts from site team reports.
- Training materials.

(3) The accrediting agency must take such actions that it deems appropriate to address any deficiencies that it identifies at an institution as part of its reviews and evaluations under paragraph (f)(1)(i) and (ii) of this section, as it does in relation to other deficiencies it may identify, subject to the requirements of this part.

(4) If, following the institutional review process under this paragraph (f), the agency finds systemic noncompliance with the agency's policies or significant noncompliance regarding one or more programs at the institution, the agency must promptly notify the Secretary.

Review Elements:
In assessing this area, Department staff looks to see if the agency discussed and demonstrated the following —

- The types of actions it takes when it concludes that an institution's policies and procedures for determining credit hour assignments are deficient.
- The written policy that the agency has, and implements, directing it to promptly notify the Secretary when the agency finds systemic noncompliance with the agency's policies regarding credit hour assignments or significant noncompliance regarding one or more programs at the institution.

Typical Documentation:
In addressing this area, suggested documentation may include the following types of items, as appropriate—

- Agency letter(s) specifying deficiencies identified in an institution's processes and procedures and agency actions.
- If appropriate, correspondence to the Secretary containing information about an institution's systemic or significant noncompliance with the agency's policies.

§668.8 Eligible program.

* * * * *

(c) * * *

(3) Be at least a one-academic-year training program that leads to a certificate, or other nondegree recognized credential, and prepares students for gainful employment in a recognized occupation.

* * *

(k) Undergraduate educational program in credit hours. (1) Except as provided in paragraph (k)(2) of this section, if an institution offers an undergraduate educational program in credit hours, the institution must use the formula contained in paragraph (l) of this section to determine whether that program satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and the number of credit hours in that educational program for purposes of the title IV, HEA programs, unless—

(i) The program is at least two academic years in length and provides an associate degree, a bachelor's degree, a professional degree, or an equivalent degree as determined by the Secretary; or

(ii) Each course within the program is acceptable for full credit toward that institution's associate degree, bachelor's degree, professional degree, or equivalent degree as determined by the Secretary provided that—

(A) The institution's degree requires at least two academic years of study; and

(B) The institution demonstrates that students enroll in, and graduate from, the degree program.

(2) A program is considered to be a clock-hour program for purposes of the title IV, HEA programs if—

(i) Except as provided in paragraph (k)(3) of this section, a program is required to measure student progress in clock hours when—

(A) Receiving Federal or State approval or licensure to offer the program; or

(B) Completing clock hours is a requirement for graduates to apply for licensure or the authorization to practice the occupation that the student is intending to pursue;

(ii) The credit hours awarded for the program are not in compliance with the definition of a credit hour in 34 CFR 600.2; or

(iii) The institution does not provide the clock hours that are the basis for the credit hours awarded for the program or each course in the program and, except as provided in §668.4(e), requires attendance in the clock hours that are the basis for the credit hours awarded.

(3) The requirements of paragraph (k)(2)(i) of this section do not apply to a program if there is a State or Federal approval or licensure requirement that a limited component of the program must include a practicum, internship, or clinical experience component of the program that must include a minimum number of clock hours.

(l) Formula. (1) Except as provided in paragraph (l)(2) of this section, for purposes of determining whether a program described in paragraph (k) of this section satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and of determining the number of credit hours in that educational program with regard to the title IV, HEA programs—

(i) A semester hour must include at least 37.5 clock hours of instruction;

(ii) A trimester hour must include at least 37.5 hours of instruction; and

(iii) A quarter hour must include at least 25 clock hours of instruction.

(2) The institution's conversions to establish a minimum number of clock hours of instruction per credit may be less than those specified in paragraph (l)(1) of this section, if the institution's designated accrediting agency, or recognized State agency for the approval of public postsecondary vocational institutions for participation in the title IV, HEA programs, has not identified any deficiencies with the institution's policies and procedures, or their implementation, for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for programs and courses, in accordance with 34 CFR 602.24(f), or, if applicable, 34 CFR 603.24(c), so long as—

(i) The institution's student work outside of class combined with the clock-hours of instruction meet or exceed the numeric requirements in paragraph (l)(1) of this section; and

(ii) (A) A semester hour must include at least 30 clock hours of instruction;

(B) A trimester hour must include at least 30 clock hours of instruction; and

(C) A quarter hour must include at least 20 hours of instruction.

[Note: §668.8(l)(2) as published inadvertently omitted the word "not" before the words "identified any deficiencies"; the Department will publish a correction shortly.]

APPENDIX P

MSCHE CREDIT HOUR VALUES

APPENDIX P

MSCHE Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Lecture 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Lecture course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs
Seminar 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Seminar course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs
Laboratory 1 credit	1 hr	2 hrs	1-2 hrs	15 hrs	30 hrs	15-30 hrs	60-75 hrs
Laboratory course 3 credits	3 hrs	6 hrs	3-6hrs	45 hrs	90 hrs	45-90 hrs	180-255 hrs
Other[e] 1 credit	3-4 hrs independent/supervised work			45-60 hrs independent/supervised work			45-60 hrs
Other[e] course 3 credits	9-12 hrs independent/ supervised work			135-180 hrs independent/ supervised work			135-180 hrs
Competency-based program	No designated time other than what is decided as a relevant time frame for student to complete work.						

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra

work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include practice, independent study, studio, and internship. Created from *Program Integrity Issues: Final Rule*, 75 Fed. Reg. 66,890 (2010) (to be codified at 34 C.F.R. pts. 600.2, 602.24, 603.24, and 668.8); and Ochoa, E. M. (2011). *Dear colleague letter*. (GEN-11-06). Washington, DC: U.S. Department of Education. Retrieved April 23, 2011 from http://ifap.ed.gov/dpcletters/attachments/GEN1106.pdf.

APPENDIX Q

CIHE CREDIT HOUR VALUES

APPENDIX Q

CIHE Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Typical student 1 credit	Combination to equate to 3 hrs			Combination to equate to 45 hrs			45 hrs
Typical student course 3 credits	Combination to equate to 9 hrs			Combination to equate to 135 hrs			135 hrs
Alternative norm 1 credit	Combination to equate to 3 hrs			Combination to equate to 45 hrs			45 hrs
Alternative norm course 3 credits	Combination to equate to 9 hrs			Combination to equate to 135 hrs			135 hrs
Experiential learning 1+ credit	3+ hrs independent/supervised work			45+ hrs independent/supervised work			45+ hrs
Experiential learning course 3 credits	9+ hrs independent/supervised work			135+ hrs independent/supervised work			135+ hrs
Graduate level 1 credit	1 hr	3+ hrs		15 hrs	45+ hrs		60+ hrs
Graduate level course 3 credits	3 hr	9+ hrs		45 hrs	135+ hrs		180+ hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include practice, independent study, studio, and internship. Created from New England

Association of Schools and Colleges Commission on Institutions of Higher Education. (2005). *Statement on Credits and Degrees*. Beford, MA: New England Association of Schools and Colleges Commission on Institutions of Higher Education. Retrieved April 17, 2010 from http://cihe.neasc.org/downloads/POLICIES/Pp110_StatementonCreditsandDegrees.pdf.

APPENDIX R

NWCCU CREDIT HOUR VALUES

APPENDIX R

NWCCU Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Typical student 1 credit	Combination to equate to 3 hrs			Combination to equate to 45 hrs			40-45 hrs
Typical student course 3 credits	Combination to equate to 9 hrs			Combination to equate to 135 hrs			120-135 hrs
Alternative norm 1 credit	Combination to equate to 3 hrs			Combination to equate to 45 hrs			40-45 hrs
Alternative norm course 3 credits	Combination to equate to 9 hrs			Combination to equate to 135 hrs			120-135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include practice, independent study, studio, and internship. Created from Northwest Commission on Colleges and Universities. (2003). *Accreditation Handbook* (2003 ed.). Redmond, WA: Northwest Commission on Colleges and Universities, and Northwest Commission on Colleges and Universities. (2010). *Glossary*. Retrieved April 19, 2010, from http://www.nwccu.org/Glossary%20and%20FAQs/Glossary/Glossary.htm.

APPENDIX S

WASCSENIOR CREDIT HOUR VALUES

APPENDIX S

WASCSenior Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Typical student 1 credit				Combination to equate to 40-45 hrs			40-45 hrs
Typical student 3 credit course				Combination to equate to 120-134 hrs			120-135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student is expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time is assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include practice, independent study, studio, and internship. Created from interview data with Participant 11 representing WASCSenior.

APPENDIX T

FLORIDA CREDIT HOUR VALUES

APPENDIX T

Florida Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
College credit 1 credit	1 hr			15 hrs			15 hrs
College credit course 3 credits	3 hrs			45 hrs			45 hrs
Career credit 1 credit	2 hrs			30 hrs			30 hrs
Career credit course 3 credits	6 hrs			90 hrs			90 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student was expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time was assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include laboratory, internships, practica, studio, and other academic work. From Postsecondary Credit Definitions, 6A F.A.C. §10.033 (2005).

APPENDIX U

INDIANA CREDIT HOUR VALUES

APPENDIX U

Indiana Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Non-contract credit 1 credit	1 hr			15 hrs			15 hrs
Non-contract credit course 3 credits	3 hrs			45 hrs			45 hrs
Contract credit 1 credit	1 hr			15 hrs			15 hrs
Contract credit course 3 credits	3 hrs			45 hrs			45 hrs
Remedial credit 1 credit	1 hr			15 hrs			15 hrs
Remedial credit course 3 credits	3 hrs			45 hrs			45 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student was expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time was assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. [e]Other types of learning include laboratory, internships, practica, studio, and other academic work. From Indiana

Commission for Higher Education. (2010). CHE data information center glossary. Retrieved August 18, 2010, from https://www.che.tate.in.us/SISAPI/Glossary.aspx; and P12 interview.

APPENDIX V

OHIO CREDIT HOUR VALUES

APPENDIX V

Ohio Credit Hour Values

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Classroom 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Classroom course 3 credit	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs
Laboratory instruction 1 credit	3 hrs			45 hrs			45 hrs
Laboratory instruction course 3 credit	9 hr			135 hrs			135 hrs
Laboratory instruction with student work 1 credit	2 hrs	1 hr		30 hrs	15 hrs		45 hrs
Laboratory instruction with student work course 3 credits	6 hrs	3 hrs		90 hrs	45 hrs		135 hrs
Clinical laboratory instruction 1 credit	3 hrs			45 hrs			45 hrs
Clinical laboratory instruction with student work 1 credit	9 hr			135 hrs			135 hrs
Clinical laboratory instruction with student work course 3 credits	2 hrs	1 hr		30 hrs	15 hrs		45 hrs

Table continued on next page.

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Directed practice 1 credit	6 hrs			90 hrs			90 hrs
Directed practice course 3 credits	18 hrs			270 hrs			270 hrs
Seminar-Practicum 1 credit	1 hr		.9 hr (46.7')	15 hrs		13.5 hrs (700.5')	28.5 hrs
Seminar-Practicum course 3 credits	3 hrs		2.7 hrs (140.1')	45 hrs		40.5 hrs (2101.5')	85.0 hrs
Cooperative work 1 credit	1 hr		1.3 hrs (66.7')	15 hrs		19.5 hrs (1000.5')	34.5 hrs
Cooperative work course 3 credits	3 hrs		3.9 hrs (200.1')	45 hrs		58.5 hrs (3001.5')	10.3.5 hrs

Table continued on next page.

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Field experience 1 credit	1.6 hrs (80')			24 hrs (1200')			24 hrs
Field experience course 3 credits	4.8 hrs (240')			72 hrs (3600')			72 hrs
Observation experience 1 credit	18 hrs (900')			270 hrs (13500')			270 hrs
Observation experience course 3 credits	54 hrs (2700')			810 hrs (40500')			810 hrs
Seminar 1 credit	1 hr	2 hrs		15 hrs	30 hrs		45 hrs
Seminar course 3 credits	3 hrs	6 hrs		45 hrs	90 hrs		135 hrs

Table continued on next page.

	Time/Week			Time/Semester			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Miscellaneous applications course 1 credit	1 hr		8.4 hr (420')	15 hrs		126 hrs (6300')	141 hrs
Miscellaneous applications course 3 credits	3 hrs		25.2 hrs (1,260')	45 hrs		378 hrs (18,900')	423 hrs
Studio 1 credit	3 hrs			45 hrs			45 hrs
Studio course 3 credits	9 hr			135 hrs			135 hrs
Studio with student work 1 credit	2 hrs		1 hr	30 hrs		15 hrs	45 hrs
Studio with student work course 3 credits	6 hr		3 hrs	90 hrs		45 hrs	135 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student was expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time was assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. Create from Ohio Board of Regents. (2010). *Directive 2010-016: Definition of Semester Credit Hour and Length of Semester Term*. Columbus, OH: Ohio Board of Regents. Retrieved September 21, 2010 from http://regents.ohio.gov/actions/documents/2010/Dir2010-016.pdf

APPENDIX W

PENNSYLVANNIA CREDIT HOUR VALUES

APPENDIX W

Pennsylvania Credit Hour Values (Private Licensed Schools)

	Time/Week			Time/Semester (14 weeks)			
Learning[a]	Class[b]	Prep[c]	Extra[d]	Class[b]	Prep[c]	Extra[d]	Total
Instruction 1 credit	1 hr			14 hrs			14 hrs
Instruction course 3 credits	3 hrs			42 hrs			42 hrs
Laboratory instruction 1 credit	2 hr			28 hrs			28 hrs
Laboratory instruction course 3 credits	6 hrs			84 hrs			84 hrs
Shop instruction & practicum experience 1 credit	3 hrs			42 hrs			42 hrs
Shop instruction & practicum experience course 3 credits	9 hrs			126 hrs			126 hrs

Note. [a]Type of learning activity. [b]Considered traditional instructional time when instructor and student are directly interacting at a designated time and place. [c]Preparation time student was expected to conduct on outside learning in preparation for class and/or extra work activity. [d]Extra time was assigned in addition to class and preparation work. Most commonly this would be associated with laboratory time. Created from *The Private Licensed Schools Act*, 022 P.C. §73.1.Definitions (2005)