
Management Controls for Distance Education at State Agencies and Accrediting Agencies

MANAGEMENT INFORMATION REPORT



**Control Number ED-OIG/A09-90030
September 2000**

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U.S. Department of Education
Office of Inspector General
Sacramento, California

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UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF INSPECTOR GENERAL

SEP 27 2000

THE INSPECTOR GENERAL

MEMORANDUM

TO: Lee Fritschler
Assistant Secretary
Office of Postsecondary Education

FROM: Lorraine Lewis *Lorraine Lewis*

SUBJECT: MANAGEMENT INFORMATION REPORT
*Management Controls for Distance Education at State Agencies
and Accrediting Agencies*
Control No. ED-OIG/A09-90030

Attached is our subject report providing information on actions taken or planned by state agencies and accrediting agencies to provide the necessary oversight to ensure that institutions using distance education methods meet state requirements and education quality standards. The report also presents the agencies' opinions and comments on various areas related to distance education. The report does not contain recommendations for Department action, but does provide information that you may find useful in making management decisions related to educational programs and courses provided through distance education methods.

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If you have any questions or wish to discuss the contents of this report, please contact Gloria Pilotti, Regional Inspector General for Audit, at (916) 498-6622. Please refer to the above audit control number in all correspondence relating to this report.

Attachment



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MEMORANDUM

TO: Greg Woods,
Chief Operating Officer
Student Financial Assistance

FROM: Lorraine Lewis *Lorraine Lewis*

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and Accrediting Agencies*
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EXECUTIVE SUMMARY

The Higher Education Amendments of 1998 define distance education as an educational process that is characterized by the separation, in time or place, between instructor and student.¹ Distance education includes programs and courses offered principally through the use of television, audio and computer transmission, audio or computer conferencing, video cassettes or discs or correspondence. Educational programs and courses offered using distance education methods may impose increased risk on the Title IV, Student Financial Assistance programs due to a significant increase in the growth of these programs. As a result, the Office of Inspector General (OIG) is conducting a review of management controls over distance education. This report provides information gathered from state agencies that license or approve higher education institutions to operate in their state and accrediting agencies that are recognized by the U.S. Department of Education (Department) for accrediting institutions authorized to participate in the Title IV programs. The information covers actions taken or planned by these agencies to provide the necessary oversight to ensure that institutions using distance education methods meet state requirements and education quality standards. The following are highlights of the information provided to us by state agencies and accrediting agencies.

Fifty-six state agencies, from a total of 46 states plus Washington, D.C. and Puerto Rico, provided information on their laws, regulations and procedures.

- Three state legislatures have passed laws and 13 states have state regulations that specifically address educational programs and courses delivered primarily through computer transmission.
- To evaluate institutions' adherence to state requirements, 21 state agencies supplemented the requirements and procedures, which were used for programs and courses offered through traditional classroom methods, with additional requirements and procedures for educational programs and courses offered through computer transmission. Only two state agencies used separate criteria and procedures for evaluating programs and courses offered through computer transmission.

Twenty-nine accrediting agencies provided us with information regarding their requirements and procedures for evaluating educational programs and courses offered through computer transmission.

- Eleven agencies used the same requirements and procedures that they used for programs and courses offered through traditional classroom methods.

¹ Throughout the report, we use the term "distance education" to refer to all educational delivery methods where there is a separation, in time or place, between instructor and student. We refer to "programs and courses delivered primarily through computer transmission" when the information is specific to this method of delivery.

- Sixteen agencies supplemented their requirements and procedures for traditional classroom methods, with additional criteria and procedures for educational programs and courses offered through computer transmission.
- Two agencies are currently developing or reviewing specific requirements for programs and courses offered through computer transmission.

Thirty-seven state agencies and 23 accrediting agencies provided opinions and comments on various areas related to distance education. The following are highlights of the information provided:

- Both state agencies and accrediting agencies indicated a high level of concern in the following areas for programs and courses delivered primarily through computer transmission:
 - education outcomes
 - student support services
 - curricula
 - faculty
 - availability of information about the institution
 - satisfactory academic progress

State agencies also indicated a high level of concern regarding out-of-state institutions offering programs and courses delivered through computer transmission to their state residents.

- Most accrediting agencies informed us that the accrediting agencies and institutions would be the best organizations to assure that the concerns listed above were addressed. State agencies varied in their opinions depending on the area of concern.
- State agencies favored more extensive or different reviews of educational programs and courses offered primarily through distance education. Accrediting agencies were generally of the opinion that it was unnecessary to require different or more extensive reviews. However, they did agree that the review techniques should be specific and somewhat modified to address distance education methods.
- State agencies and accrediting agencies viewed several of the Title IV program requirements as safeguards that protect the student and/or taxpayer interest when institutions are using or considering the use of distance education methods.

The state agencies and accrediting agencies offered several recommendations for Federal action that would enhance their agencies' procedures for protecting students and ensuring quality of educational programs and courses offered through distance education methods. The report details these recommendations and provides additional information and comments provided by the state agencies and accrediting agencies. We suggest that the Assistant Secretary for Postsecondary Education and the Chief Operating Officer for Student Financial Assistance consider the information contained in this report, when appropriate, in making management decisions related to institutions that offer educational programs and courses provided through distance education methods.

The methodology used to obtain the information is described in the PURPOSE, SCOPE AND METHODOLOGY section of the report. We did not confirm the information provided or evaluate the effectiveness of the agencies' policies and procedures. The comments and opinions presented in the report are those provided by the agencies and do not necessarily represent the position or opinion of the OIG.

STATE AGENCIES' AND ACCREDITING AGENCIES' OVERSIGHT, CONCERNS AND RECOMMENDATIONS ON MANAGEMENT OF DISTANCE EDUCATION

The Higher Education Amendments of 1998 define distance education as an educational process that is characterized by the separation, in time or place, between instructor and student. Distance education includes programs and courses offered principally through the use of television, audio and computer transmission, audio or computer conferencing, video cassettes or discs or correspondence. The purpose of our review was to obtain information on state agencies' and accrediting agencies' oversight of such programs and courses. Our data collection efforts were primarily focused on educational programs and courses delivered primarily through computer transmission.

A total of 56 state agencies² and 29 accrediting agencies provided us with information on their oversight of educational programs and courses delivered primarily through computer transmission. The 56 state agencies represented 80 percent of the nation's state agencies. The 29 accrediting agencies represented 78 percent of the accrediting agencies recognized by the Department for Title IV purposes. Thirty-seven of the 56 state agencies and 23 of the 29 accrediting agencies also provided us with their opinions, comments and recommendations on various areas as they relate to distance education. Appendices A and B of this report list the state agencies and accrediting agencies that provided information.

State Laws and Regulations

State legislatures have passed laws and state agencies have implemented regulations to address distance education issues. Four state agencies (three states) reported having state laws in place that specifically address educational programs and courses delivered primarily through computer transmission. Fourteen state agencies (13 states) reported having state regulations that specifically address such programs and courses.

² To simplify reporting, we use 56 state agencies throughout the report which includes agencies from Washington, D.C. and Puerto Rico.

Table 1 – State Laws and Regulations (56 responses)		
Description	States Laws	State Regulations
Currently in place that specifically address programs and courses delivered primarily through computer transmission	4 (a)	14 (a)
None currently in place but considering such laws or regulations	16	23
None currently in place and not considering such laws and regulations	35	19

(a) Includes two state agencies for the same state.

The state laws currently in place for the four state agencies specified that the state agency’s jurisdiction included institutions physically located outside the state that offer instruction or academic degrees to state residents. One state defined “distance education” in its statutes as a teaching and learning institution in which the instructor and the learner are geographically separated, and instruction and materials are delivered and/or exchanged by mail, electronic devices or other means.

Ten of the 14 state agencies provided us with their state regulations that were specific to programs and courses delivered through computer transmission. Four of the ten state agencies reported that their states have current regulations that require approval for out-of-state schools with a physical presence in their states. Physical presence was generally described as having an instructional site in the state, offering instruction within the state or providing advertising, promotional material or solicitation in any form that targets state residents or uses local advertising markets.

Six of the ten state agencies’ current state regulations specify quality standards for distance education or require distance education programs and courses to meet the same quality standards as traditional classroom programs and courses. The following are some of the quality standards specified in the state regulations:

- When evaluating institutions with unconventional educational methods, the minimum evaluation elements and requirements shall be adjusted to the particular circumstances of each case.
- Distance education, home study and correspondence programs must be comparable in content, faculty and resources to those offered in residency and include provision for periodic student-to-faculty interaction.
- The program shall provide appropriate real-time or delayed interaction between faculty and students.
- The program shall provide training for faculty who use technology instruction.
- Each program shall result in learning outcomes appropriate to the rigor and breadth of the degree program offered.
- Educational goals and overall program goals are achievable through distance education and graduates of distance education exhibit the skills and knowledge equivalent to resident programs of a similar nature.

- Each course must provide timely feedback to students about their progress and performance by methods equivalent to those used for traditional classroom programs and courses.
- Each student must have access to appropriate academic support services.

Agency Requirements and Procedures for Evaluating Educational Programs and Courses

State agencies and accrediting agencies varied on whether they used the same, supplemental or separate requirements and procedures to evaluate educational programs and courses delivered primarily through computer transmission. Over half of the state agencies indicated that they used the same requirements and procedures for evaluating programs and courses delivered through traditional classroom methods and computer transmission. For accrediting agencies, about 38 percent used the same requirements and procedures.

Table 2 – Requirements and Procedures Used for Initial Evaluation of Educational Programs and Courses		
Description	State Agencies <i>(56 responses)</i>	Accrediting Agencies <i>(29 responses)</i>
Use same requirements and procedures for traditional classroom methods and computer transmission.	32	11
Use additional requirements or procedures for computer transmission that supplement those used for traditional classroom methods.	21	16
Separate requirements and procedures for computer transmission.	2	—
Do not use requirements and procedures	1	—
Currently developing or reviewing specific requirements for computer transmission	—	2

Some of the state agencies and accrediting agencies that used the same requirements informed us that they are either considering or in the process of developing specific distance educational requirements. Some agencies have established or were in the process of establishing task forces or focus groups to tackle specific requirements or procedures for distance education.

One state agency was attempting to monitor activities of institutions located in and outside the state. One accrediting agency offered training sessions on computer transmission for evaluators. Another accrediting agency performed follow-up and special visits to institutions that offer programs and courses using computer transmission methods.

The following are examples of state agency requirements or guidelines for distance education programs and courses:

- An institution shall provide evidence that it has evaluated the programs' educational effectiveness, including assessments of student learning outcomes, student retention, student and faculty satisfaction and cost-effectiveness. An institution shall provide assessment and documentation of student achievement in each course and at completion of the program.
- Colleges wishing to offer programs or courses for credit through individual and group study mediated and assisted by telecommunications, computer augmented educational services, facsimile transmission or the postal service, shall describe the methodology and shall submit course outlines and competencies and all other documentation required by the standards. Colleges shall maintain records of dates on which lessons, projects and dissertations were received and responses delivered.
- Each institution shall address issues related to ownership and intellectual property derived from the creation and production of software, telecourses or other electronically offered programs.
- Distance education courses or programs must consist of at least a preliminary lesson or set of instructions on how to study by the home study method or adequate study instructions per assignment.
- Academic admission criteria for the distance education programs offered have been established and are consistent with the admissions standards for similar programs at institutions using only traditional classroom methods.
- A credit hour for distance education must be comparable work to that required for a credit hour in a traditional classroom setting.
- Content and delivery may be different but must be equivalent to traditional classroom courses. If a provider supplies an entire program, the provider must be accredited by the applicable accrediting agency.
- Faculty functions must include approval of academic policies, program planning and evaluation, academic advisement, consulting with student on assignments and related intellectual matters, instruction and evaluation of student work. A published list of distance education program faculty members, including their qualifications, must be made available to prospective students.
- Publications should be clear to students about the technological equipment they will need, costs/fees they may be charged, what to do if they have problems with technology and when technical assistance is available.
- The institution shall provide students with complete and timely information regarding course and degree requirements, nature of faculty/student interaction, assumptions about technological competence and skills, technical equipment requirements, availability of academic support services, financial aid resources, and costs and payment policies.
- In the case of an Internet site, the state-authorizing agency must be an electronic link from the institution's web site. Institutions cannot make statements about accreditation

unless the accreditation is identified and is that of an appropriate nationally recognized accrediting agency listed by the Department.

- Any school offering distance education courses of instruction shall provide a plan that includes a list of the infrastructure and personnel that will be employed to support the distance education courses of instruction.
- In the case of collaborative distance education degree programs, it is the responsibility of the institutions offering the programs to determine which institution will grant the degree. Students who are taking coursework at more than one institution shall be counted by each institution based on a full-time equivalent standard unless a consortia agreement exists between/among the institutions regarding which will count the student for enrollment purposes.

The following are examples of accrediting agency requirements or guidelines for distance education programs and courses:

- Schools must justify and explain any deviation from the accrediting agency's established clock-to-credit hour conversions.
- Clear policies on ownership of instructional materials and protection of copyright must be established.
- The faculty must be adequately trained in this form of educational delivery.
- The institution must provide an adequate means for resolving student complaints.
- All facilities/sites must be identified for review and monitoring.
- Facilities, staffing, equipment and other resources associated with the viability and effectiveness of the distance education program must reflect the institution's long range planning, budgeting and policy development.
- The applicable admissions tests, if conducted on-line, must be administered in a manner that includes a verification of the student's identity.
- Admissions policies, procedures and practices, including all promotional information and enrollment agreement, must fully and clearly represent the conditions and requirements related to distance education.
- Cooperative relationships with other distance education institutions and networks are defined. Such relationships may be used to develop institutional expertise in the design and delivery of quality courses that use effective distance education technologies.
- The school retains responsibility for the quality and the achievement of expected and acceptable outcomes, irrespective of any contractual arrangements, partnerships or consortia entered into with third parties for the provision of components of a distance education course or program.

- Student/teacher ratios and lecture/laboratory allocation section of the distance education guidelines states that institutions must demonstrate compliance with applicable Federal and state regulations.

Agency Monitoring Efforts

State agencies and accrediting agencies described their monitoring efforts for continued licensing/approval and accreditation of programs and courses and their opinions on reviews covering distance education methods. Also, the agencies described the complaints received related to distance education.

Review types and procedures/techniques. Forty state agencies and 24 accrediting agencies provided information on the type of monitoring reviews used by their agency. Twenty-five of the 40 state agencies used on-site reviews for continued licensing/approvals to operate in their state. Several agencies used both desk and on-site reviews. All 24 of the accrediting agencies used on-site reviews for continued accreditation.

Table 3 – Types of Monitoring Reviews		
Description	State Agencies <i>(40 responses)</i>	Accrediting Agencies <i>(24 responses)</i>
Desk review of documents submitted by institutions	29	16
On-site review at institutions	25	24
Neither desk review nor on-site review	4	—

For both state agencies and accrediting agencies the frequency of monitoring reviews varied from every year to every ten years.

Most of the state agencies and accrediting agencies used the same procedures/techniques for monitoring reviews of programs and courses delivered through traditional classroom methods and computer transmission.

Table 4 – Procedures/Techniques Used in Monitoring Reviews		
Description	State Agencies <i>(36 responses)</i>	Accrediting Agencies <i>(24 responses)</i>
Same procedures/techniques for programs and courses are used for traditional classroom methods and computer transmission	26	14
Supplement those used for traditional classroom methods with additional procedures/techniques for programs and courses using computer transmission	9	9
Separate procedures/techniques for programs and courses using computer transmission	1	1

Agencies' opinions on reviews of distance education methods. Thirty-one state agencies and 20 accrediting agencies provided their opinion on whether institutions offering programs and courses through distance education methods should be subjected to a different or more extensive review than institutions that use only traditional classroom methods.

State Agencies

- Sixteen of the state agencies stated that different or more extensive reviews were appropriate. One agency representative explained that providers offering only distance education programs and courses need a full-scale review since they have no traditional campus for comparison basis. Another stated that there is a need to build a new virtual classroom rubric to address distance education. Another explained that the different review criteria or techniques should address areas in which distance education may have more impact on learning outcomes, such as access, integrity, qualification of the faculty and technology.
- Fifteen of the state agencies stated that the same type of review should be conducted for both traditional classroom and distance education programs and courses. One state representative stated that as long as institutions provide the same level of oversight and the same quality of educational programs and courses, there is no need to have a different or more extensive review. Some state agency representatives indicated that quality of content is important, not the mode of delivery.

Accrediting Agencies

- Nine of the accrediting agencies generally thought that the review should be specific and somewhat modified to address distance education. The other eleven accrediting agencies thought that the reviews did not need to be different or more extensive.

Both the state agencies and accrediting agencies stated that the focus of a review should be to ensure the quality of education rather than on the procedures used. That is, the accountability and integrity of distance education should be the same as traditional classroom education.

Complaints related to distance education. Thirty-five state agencies and 23 accrediting agencies provided information regarding complaints related to distance education. Twenty-two state agencies and 19 accrediting agencies reported that they had not received complaints related to distance education. The following are examples of the types of complaints that were provided by the 13 state agencies and 4 accrediting agencies that reported receiving complaints related to distance education:

- Quality misrepresented
- Quality of instructional materials
- Equipment not dependable
- Insufficient faculty preparation
- Inadequate feedback from the instructor
- Institution not licensed
- Institution not accredited
- Substandard institutions offering on-line degrees

Areas of High Concern to Agencies

Thirty-seven state agencies and 23 accrediting agencies provided their levels of concern on various areas when programs and courses are delivered primarily through computer transmission. Fifty percent or more of state agencies and accrediting agencies indicated that they were highly concerned in the following areas:

- education outcomes
- curricula
- availability of information about institution
- student support services
- faculty
- satisfactory academic progress

Also, 50 percent of the state agencies indicated that they were highly concerned about out-of-state institutions offering programs and courses delivered through computer transmission to state residents. Appendix C provides a complete list of areas for which agencies indicated their level of concern and the percentage of agencies that responded for each concern level (high, moderate or low).

Educational Outcomes. Twenty-six state agencies and 19 accrediting agencies considered the educational outcomes as a high area of concern. As shown in Table 5, at least 65 percent of these agencies considered both completion/graduation rates and assurance that the student is the one taking the test/completing the work as significant concerns within the educational outcomes area.

Description	State Agencies (26 responded High)	Accrediting Agencies (19 responded High)
Completion/Graduation rates	73%	74%
Assurance that the student is the one taking the test/completing the work	65%	68%
Drop out rates	54%	58%
Placement rates	46%	53%
Professional and vocational licensing	46%	47%

State agencies expressed the opinion that the following distance education guidelines should be considered to address the educational outcome area:

- Institutions should develop and implement assessment systems.
- Schools offering distance education courses of instruction should assess students' ability to succeed in this form of delivery.
- Educational goals and overall program goals must be achievable through distance education and graduates should exhibit the skills and knowledge equivalent to resident program graduates of similar programs.

Accrediting agencies generally agreed that the following educational outcome guidelines, standards and issues must be addressed and considered.

- Observable, measurable and achievable student performance outcomes shall be identified and compared to programs and courses with similar subject matter and objectives.
- Course or program evaluations must include assessments of educational outcomes, student retention, as well as student, faculty and employer satisfaction, to assure comparability to traditional classroom programs.
- The institution must ensure the integrity of student work and the credibility of the degrees and credits it awards to students.

One accrediting agency explained that it required institutions to assess those student outcomes that may be compared to the traditional classroom student outcomes. Another agency expressed concerns with students' ability to pass licensure and certification exams.

Student Support Services. Twenty-two state agencies and 20 accrediting agencies considered student support services as a high concern. Table 6 shows the specific areas within the student support services area that these agencies considered as high areas of concern.

Table 6 – High Concerns Within Student Support Services Area		
Description	State Agencies (22 Responded High)	Accrediting Agencies (20 Responded High)
Academic advising	82%	100%
Delivery of course materials, including technical assistance in accessing materials	82%	95%
Access to library and research materials	82%	80%
Admissions	68%	55%
Financial aid	50%	60%

State agencies identified the following as issues that should be considered and addressed.

- Assistance in the technical operations, as well as in student services such as admissions, enrollment, advisement and financial aid, must be conveniently available.
- Access to a library or comparable resources that can provide students with the materials necessary for successful completion of the course.
- Access to general electronic or computer resources necessary for successful completion of the class, including, but not limited to word processing and other productivity tools, e-mail and Internet services.

Accrediting agencies generally agreed that the following student support services guidelines, standards and issues must be addressed and considered.

- Students must have the range of student services appropriate to support the program and must include tutoring, academic advising, testing, grading, financial aid, delivery of books and other materials, placement, counseling and a means for resolving student complaints.
- Student must have access to and be able to effectively use appropriate library resources, laboratories, facilities and equipment appropriate to the courses or programs.

One accrediting agency indicated that students need to be able to contact institutions from a distance on academic and administrative issues. Another accrediting agency suggested orientation for students in programs and courses offered through computer transmission

Curricula. Twenty-one state agencies and 15 accrediting agencies considered curricula as a high area of concern. Table 7 shows the areas within curriculum that most of these agencies considered as high areas of concern.

Table 7 -- High Concerns Within Curricula Area		
Description	State Agencies (21 responded High)	Accrediting Agencies (15 responded High)
Contents consistent with the program objectives	76%	93%
Delivery method appropriate to the curricula and student	76%	87%
Comparability of courses delivered through computer transmission versus courses provided on-site	71%	87%
Currency of materials, programs and courses	62%	73%
Evaluation of prepackaged and other curriculum developed by the faculty	48%	67%

State agencies identified the following as issues that should be considered and addressed.

- Instructional methodologies must allow for easy and clear student/faculty and student/student interaction.
- Distance education programs and courses shall be clearly defined and related to the institution's mission and shall be consistent with the goals and objectives of the institution.

Accrediting agencies generally maintained that the following curricula principles, guidelines and standards must be addressed and considered.

- Program and courses must be appropriate for delivery through distance education and consistent with the institution's role and mission.
- There must be sufficient, appropriate and timely interaction between students and faculty and among and between students.
- Clock or credit hours awarded must be appropriate for the degree and credentials offered and the school justifies and explains any deviation from the accrediting agency's established clock-to-credit hour conversions.
- The materials, programs and courses must be current.
- Policies must be clear concerning ownership of materials and protection of copyright issues.

One accrediting agency stated that as part of its curricula evaluation it goes on-line to review the course. One agency stated that it requires separate accreditation when a new course is added that involves significant curricula changes. This agency explained that the process was to ensure the change of the course materials is consistent with the course objective.

Faculty. Twenty-four state agencies and 15 accrediting agencies considered faculty as a high area of concern.

Table 8 -- High Concerns Within Faculty Area		
Description	State Agencies (24 responded High)	Accrediting Agencies (15 responded High)
Faculty acquires and maintains instructional skills appropriate for courses delivered primarily through computer transmission	83%	87%
Timely & appropriate level of interaction between student and faculty	67%	80%
Faculty has appropriate training in computer technology	71%	73%
Number of courses assigned to each instructor	42%	60%
Faculty-student ratio	38%	53%

The state agencies generally maintained that the following were issues that should be considered and addressed.

- Ensure that faculty are trained to effectively use the distance education method employed.
- Ensure there is assistance available to the faculty in the case of technological problems both at the time of instructional delivery and at other times.
- Ensure the faculty/student ratio is educationally sound for the type of instructional delivery.

Accrediting agencies generally agreed that the following faculty issues, standards and guidelines must be addressed and considered.

- Faculty must assume responsibility for and exercise oversight of distance education.
- Faculty must be adequately trained in this form of delivery.
- The appropriate educational resources and equipment must support faculty in order to deliver instruction using this method.
- There must be policies in place that address teaching load (student/teacher ratio), class size and time needed for course development.
- Faculty who teach at a distance must be appropriately oriented and trained in the effective use of the technology and methodology to ensure student motivation and quality of instruction.
- Consider national training programs for faculty.

Availability of Information. Twenty-two state agencies and 13 accrediting agencies considered availability of institutional information as a high area of concern.

Table 9 -- High Concerns Within Availability of Information Area		
Description	State Agencies (22 responded High)	Accrediting Agencies (13 responded High)
Accreditation disclosure	77%	92%
State approval disclosure	82%	77%

State agencies generally concluded the following were issues that should be considered and addressed.

- Catalogs or brochures should provide students with clear and complete information on the nature of faculty/student interaction, prerequisite technology competencies and skills, technical equipment requirements and availability of academic support services.
- The institution's catalog and promotional materials shall indicate the maximum time permitted for the completion of each course and program offered through distance education. Any difference in tuition and fee charges for on-campus and distance shall be clearly indicated.

One state agency indicated that state boards or professional associations should approve the information about institutions. One state agency stressed the importance of providing students and prospective students with sufficient and accurate information to help them make intelligent decisions when enrolling in on-line programs or courses. Another agency stated that students (consumers) should have convenient access to information.

Accrediting agencies generally agreed that catalogs, other publications and advertising must clearly describe distance education programs and courses, including the delivery system used, the prerequisites, expected educational outcomes, completion requirements and student services.

Satisfactory Academic Progress. Twenty-two state agencies and 12 accrediting agencies considered standards of satisfactory academic progress as a high area of concern.

Table 10 -- High Concerns Within Satisfactory Academic Progress Area		
Description	State Agencies (22 responded High)	Accrediting Agencies (12 responded High)
Minimum academic standard/qualitative progress evaluation	86%	92%
Integrity of student work	86%	75%
Grading policy	55%	58%

One state agency had a specific distance education guideline that institutions must have mechanisms in place to assure the integrity of student work and validity of student testing in distance education. Another state agency expressed concern that instruction delivered through computer transmission establishes new parameters for structuring of education and training, and

therefore, this state agency concluded that concepts such as time frame, residency, course length and credit/contact hours are no longer adequate for instruction delivered through this medium.

One accrediting agency had a specific guideline that measurement of students' progress should be comparable to that used for other programs/courses. Another accrediting agency stated that completion requirements should be clearly described in the catalog and other publications.

Out-of-state Institutions. Most state agencies had jurisdiction over institutions that had some type of facility or employees/agents located in their state. However, only about 43 percent of the state agencies had jurisdiction over institutions that used an advertising medium to target state residents, but had no facilities or employees/agents in the state.

Table 11 – Institutions Covered By State Licensing/Approval Jurisdiction³	
Institutions with a physical facility in the state where instruction takes place.	100%
Institutions with a physical facility in the state where administrative function occurs.	80%
Institutions with instructors or other educational providers located in the state, but the institution has no physical facility in the state.	68%
Institutions with employees or agents located in the state that are recruiting state residents for enrollment.	63%
Institutions that only have physical facilities in the state that house computer support equipment and staff.	53%
Institutions using an advertising medium that target state residents. (For example, local broadcasts and city newspapers)	43%

Twenty-two state agencies indicated that they were highly concerned about out-of-state institutions offering programs and courses delivered through computer transmission to their state residents.

Table 12 – High Concerns By Type of Out-of-State Institution	
Description	State Agencies (22 Responded High)
Out-of-state institutions with physical facilities in the respondent's state	82%
Out-of-state institutions with no physical facilities, but have instructors located in the respondent's state	77%
Out-of-state institutions that advertise in the respondent's state	59%
Out-of-state institutions that have recruiters located in the respondent's state	55%

One state agency expressed concern about how it would monitor the technology being utilized by out-of-state institutions and handle complaints from international students. Another state agency stated that it is difficult to regulate schools with no physical facilities, instructors, employees or recruiters in its state.

³ The percentages are based on information provided by 40 state agencies.

Agencies’ Opinions on Oversight Agency That Could Best Address the Areas of Concern.

Over 50 percent of the accrediting agencies indicated that the accrediting agencies and the institutions could best assure the high areas of concern are addressed, except for the area concerning the availability of information. In that area, 46 percent of the accrediting agencies listed the state agencies in addition to the accrediting agencies and institutions.

The state agencies varied in their opinions as to the oversight entity or combination of oversight entities that could best assure the high areas of concern are addressed. Table 13 shows the most frequent combinations of oversight entities that were indicated by the state agencies.

High Area of Concerns	State Agencies and Institutions	State and Accrediting Agencies and Institutions	State, Accrediting and Federal Agencies	State, Accrediting, Federal Agencies and Institutions
Educational Outcome	27%	31%	4%	12%
Student Support Services	18%	41%	N/A	14%
Curricula	24%	29%	N/A	14%
Faculty	29%	29%	4%	8%
Availability of Information	14%	18%	23%	9%
Satisfactory Academic Progress	27%	36%	5%	14%

The state agencies also varied in their opinions on the oversight agencies that could best assure their concerns regarding out-of-state institutions were addressed. About 32 percent of the highly concerned respondents felt that the state agencies alone could best assure that issues are addressed concerning out-of-state institutions offering programs and courses primarily through computer transmission. About 18 percent indicated that state agencies and accrediting agencies should take oversight responsibility, while about 14 percent indicated institutions, accrediting agencies and state agencies should have oversight responsibility. Three state agencies suggested that the State Higher Education Executive Offices Association (SHEEO),⁴ employers and students could best assure that these areas of concern are addressed. One state agency suggested independent reviewers selected by a state agency as another way of addressing the area of concern.

⁴ SHEEO is a nonprofit, nationwide association of the chief executive officers serving statewide coordinating boards and governing boards of postsecondary education. According to SHEEO, its objectives include developing the interest of the states in supporting quality higher education and promoting the importance of state planning and coordination as the most effective means of gaining public confidence in higher education. Forty-nine states and Puerto Rico are SHEEO members.

Agency Views on the Title IV Requirements

Thirty-two state agencies and 16 accrediting agencies provided us with their views on various Title IV requirements. The state agencies and accrediting agencies considered several of the Title IV requirements as safeguards that protect student and/or taxpayer interests from abuse when institutions are using or considering the use of distance education methods. However, there were a few of the Title IV requirements where state agencies and accrediting agencies had differing points of view. The state agencies considered the Title IV requirements as safeguards from abuse, while the accrediting agencies considered the requirements as limitations or prohibitions to institutions' use of distance education methods.

At least 50 percent of the state agencies and the accrediting agencies considered the Title IV requirements listed in Table 14 as safeguards from abuse.

Table 14 -- Title IV Requirements That Both State Agencies and Accrediting Agencies Considered a Safeguard		
Description	State Agencies	Accrediting Agencies
Student eligibility – ability-to-benefit tests	56%	88%
Refunds – fair and equitable refund policy	72%	88%
Refunds – determining period of enrollment for which the student has been charged	63%	75%
Loan counseling – individual or group counseling both prior to taking out loan and before completion/leaving program of study	67%	75%
Refunds – determining the withdrawal date	66%	69%
Program eligibility – minimum program length	52%	50%
Student eligibility – enrollment status (full-time, half-time, etc.)	52%	50%
Disbursement of the Title IV funds – student's satisfactory academic progress	50%	50%

At least 66 percent of the state agencies considered the Title IV requirement listed in Table 15 as a safeguard from abuse.

Table 15 – Title IV Requirement That Only State Agencies Considered a Safeguard		
Description	State Agencies	Accrediting Agencies
Institutional eligibility – ineligible if more than 50 percent of students had neither a high school diploma or its equivalent (non-degree granting institutions)	66%	37%

At least 56 percent of the accrediting agencies considered the Title IV requirements listed in Table 16 as safeguards from abuse.

Table 16 – Title IV Requirements That Only Accrediting Agencies Considered a Safeguard		
Description	Accrediting Agencies	State Agencies
Student eligibility – reconciliation of conflicting information provided on Federal Application for Financial Student Assistance	56%	40%
Financial need calculation - cost of attendance	56%	47%

State agencies considered the Title IV requirements listed in Table 17 as safeguards from abuse, while the accrediting agencies considered these same Title IV requirements as limitations on institutions’ use of distance education methods.

Table 17 – Title IV Requirements That State Agencies Considered a Safeguard and Accrediting Agency Considered a Limitation		
Description	State Agencies Considered Safeguard	Accrediting Agencies Considered Limitation
Institutional eligibility – ineligible if more than 50 percent of courses delivered using correspondence/telecommunications	56%	81%
Institutional eligibility – ineligible if more than 50 percent of students are enrolled in courses delivered using correspondence/telecommunications	50%	81%

Agency Interactions with Other Agencies

Forty state agencies and 23 accrediting agencies provided us with information on their interactions with other agencies on distance education issues. In general, the state agencies and accrediting agencies have contacted others regarding issues related to distance education.

State Agency Interactions. Contacts have taken place between state agency and other state agencies and accrediting agencies on issues related to distance education. However, the frequency of interactions varied among state agencies.

Table 18 –State Agency Interactions with Other Agencies		
Description	Other State Agencies	Accrediting Agencies
No interaction	2	3
Interaction with 1 to 5	17	33
Interaction with 6 to 10	7	2
Interaction with 11 or more	14	2

Forty-nine percent of the state agencies stated that they have contacted the Department on issues related to distance education.

Accrediting Agency Interactions. Dialogue has taken place between accrediting agencies and with state agencies on issues related to distance education. As with state agencies, the frequency of interactions varied among accrediting agencies.

Description	Other Accrediting Agencies	State Agencies
No interaction	2	7
Interaction with 1 to 5	11	8
Interaction with 6 to 10	4	5
Interaction with 11 or more	6	3

Sixty-five percent of the accrediting agencies stated that they have contacted the Department on issues related to distance education.

Additional Organization Interactions. The state agencies and accrediting agencies had also contacted other organizations on issues related to distance education. The following is a list of those organizations that were most frequently mentioned by the agencies:

- SHEEO
- Southern Regional Education Board
- Council for Higher Education Accreditation
- Distance Education and Training Council
- American Council on Education

Recommendations for Federal Action on Distance Education from State Agencies and Accrediting Agencies

State agencies and accrediting agencies had several recommendations for Federal action that would enhance their licensing/approval and accreditation procedures for protecting students and ensuring quality of programs and courses that are offered primarily through distance education.

State agencies offered the following recommendations:

- Establish an agency similar to the Federal Trade Commission that has guidelines for non-profit institutions. According to the state agency that made this recommendation, the Federal Trade Commission has guidelines for private school businesses.
- Develop a national recognition system (such as a Seal of Approval) to designate institutions that have met state requirements and accreditation standards.
- Require distance education providers to add a student identity verification component in order to qualify for the Title IV funds.
- Work together with accrediting, state agencies and institutions to create a model code that helps in developing state regulations and rules.
- Create a vehicle to better share best practices among agencies.

- Develop national or Federal regulated standards for Internet programs and courses.
- Facilitate development of accrediting standards and procedures for use by all national and regional accrediting agencies.
- Encourage states to strengthen distance education laws.
- Mandate an independent review by SHEEO or a state agency at least once every five to seven years.
- Require Federal regulation for institutions offering programs using distance education methods when the institution operates in a state that does not provide sufficient regulation of educational programs.
- Encourage continual cooperation between the states, accrediting agencies and the Department.
- Provide Federal attention to instruction delivered across state lines and prosecution of fraud.

The accrediting agencies made the following recommendations:

- Require institutions to implement an assessment program that will measure student education outcome as part of the required accreditation standards.
- Establish a student hotline for whistleblowers.
- The Department should seek rigorous prosecution of Title IV fraud and abuse.
- Congress and the Department should support grants for program development and evaluation so that educators can learn more on this subject and have more resources to try new and different learning strategies.
- The Department should carefully monitor the Distance Education Demonstration Project.

PURPOSE, SCOPE AND METHODOLOGY

The objective of our review was to obtain information on state agencies' and accrediting agencies' oversight of educational programs and courses offered using distance education methods. Our data collection efforts were primarily focused on educational programs and courses delivered primarily through computer transmission. We also obtained the agencies' insights on areas of concerns and Federal involvement regarding distance education.

To accomplish our objective, we met with Department officials to obtain background information about state agencies and accrediting agencies. We conducted site visits at three state agencies and two accrediting agencies that the Department considered progressive in addressing distance education issues.

At the three state agencies, we:

- Identified and reviewed state laws, regulations and standards for approving traditional schools and classroom programs and those that are unique to distance education.
- Reviewed criteria for allowing within state institutions to offer distance education when a student is not a state resident and out of state programs when a student is a state resident.
- Obtained the state agency's views on state laws, regulations and standards and future issues related to distance education.
- Identified the state agency's procedures for monitoring and assessing the institution adherence to distance education requirements and standards.
- Reviewed institutional case files to confirm state agency's procedures were applied.

At the two accrediting agencies, we:

- Reviewed the most current accrediting agency standards and procedures and used accrediting standards for traditional classroom programs as our baseline.
- Conducted interviews with the accrediting agency officials to obtain their views on future issues regarding distance education and Federal laws and regulations as they relate to distance education.
- Identified accreditation standards and procedures that are unique to distance education.
- Reviewed institutional case files to determine whether the accrediting agencies applied the same standards for the distance education programs and courses.

We contacted a total of 70 state agencies and 37 accrediting agencies to advise them of our review and solicit information for our review. Fifty-six state agencies provided us with written information on their state laws, regulations and procedures. Twenty-nine accrediting agencies provided us with written information on their requirements and procedures. Of these agencies, 37 state agencies and 23 accrediting agencies also provided us with their written concerns and opinions related to educational programs and courses offered through distance education.

We summarized the information for inclusion in our report. We also analyzed the information to identify common areas of concern. We did not confirm the information provided or evaluate the effectiveness of the agencies' policies and procedures.

We conducted our site visits at the state agencies and accrediting agencies in July and August 1999. Information from the other state agencies and accrediting agencies was collected during the period October 1999 through April 2000. Our review was performed in accordance with generally accepted government auditing standards appropriate to the scope of the review described above.

APPENDIX A

State Agencies That Provided Information

Table 20 identifies the 56 state agencies that provided us with information, opinions or concerns regarding program and courses offered primarily through computer transmission and other areas related to distance education. Several of the agencies provided us with the number of institutions that the agency licensed/approved and the actual or estimated number of those institutions that provided programs and courses primarily through computer transmission.

Table 20 – State Agencies That Provided Information			
State Agency	Institutions Approved	Using Computer Transmission	
		Courses	Programs
Alaska Commission on Postsecondary Education	35	5	2
Alabama State Department of Education (2)			
Arkansas Department of Higher Education (2)			
Arizona State Board of Private Postsecondary Education	122	9(E)	32(E)
California Bureau for Private Postsecondary and Vocational Education	2300	100(E)	100(E)
Colorado Department of Higher Education Division of Private Occupational School	240	12(E)	12(E)
Colorado Commission on Higher Education	84	27(E)	5(E)
Connecticut Department of Higher Education	111	30(E)	4(E)
Education Licensure Commission, Washington, D.C. (2)			
Delaware Department of Education	15	1	1(E)
Florida State Board of Independent Colleges and Universities	207	25(E)	5(E)
Georgia Nonpublic Postsecondary Education Commission	130	10(E)	15(E)
Hawaii Department of Education (2)			
Iowa Department of Education (2)			
Idaho State Board of Education	7		0
Illinois State Board of Education (1)	240	4(E)	4(E)
Illinois Board of Higher Education (1)	169		
Indiana Commission on Proprietary Education	114	0	0
Kansas Board of Regents			
Kentucky Council on Postsecondary Education	79	30(E)	10(E)
Louisiana Division of Adult Education and Training (2)			
Louisiana Board of Regents	75	75	0
Massachusetts Private Postsecondary Schools (2)			
Maryland Higher Education Commission	58	58	12
Maine Higher Education Services (2)			
Michigan Department of Education (2)			
Minnesota Higher Education Services (2)			
Missouri Coordinating Board for Higher Education	120	5(E)	5(E)
Nebraska Department of Education (2)			

Nebraska Coordinating Commission for Postsecondary Education			
University of North Carolina	5		
North Dakota State Board of Vocational And Technical Education - Division of Independent Study			
Nevada Commission on Postsecondary Education	123	1	1
New Hampshire Postsecondary Education Commission	35	30(E)	30(E)
New Jersey Commission on Higher Education	59	0	0
New York Bureau of Proprietary Schools (2)			
New York State Education Department	268		
Ohio State Board of Proprietary School Registration	205	10(E)	5(E)
Oklahoma Board of Private Vocational Schools (2)			
Oklahoma State Regents for Higher Education	46	15(E)	5(E)
Oregon Department of Education (2)			
Oregon Student Assistance Commission, Office of Degree Authorization	51		
Pennsylvania Department of Education	265		
Puerto Rico Council on Higher Education	41	5	2
Rhode Island Office of Higher Education	25		
South Dakota Board of Regents (2)			
Tennessee Higher Education Commission (1)	156	10(E)	2(E)
Texas Workforce Commission, Proprietary Schools	360	0	0
Utah State Board of Regents	87	6(E)	6(E)
Vermont Department of Education	8		
Virginia Council of Higher Education (2)			
Washington Workforce Training and Education Coordinating Board	253	2	2
Washington Higher Education Coordinating Board	80		
Wisconsin Education Approval Board	123		4(E)
West Virginia State College and University Systems	16	8(E)	1(E)
Wyoming Department of Education	23	4(E)	4(E)

(1) Site Visit

(2) Provided information regarding requirements only.

(E) Represents an estimate.

Note: The area is shaded for those agencies that either did not provide the information or indicated that they could not estimate the number.

APPENDIX B

Accrediting Agencies That Provided Information

Table 21 identifies the 29 accrediting agencies that provided us with information, opinions or concerns regarding program and courses offered primarily through computer transmission and other areas related to distance education. Several of the agencies provided us with the number of institutions that the agency licensed/approved and the actual or estimated number of those institutions that provided programs and courses primarily through computer transmission.

Also, the Distance Education and Training Council (Council) provided us with information on their standards and procedures and other information related to distance education methods. According to the Council, its purpose is to promote sound educational standards and ethical business practices within correspondence schools. While the Council is recognized by the Secretary as a national accrediting agency, accreditation by the Council does not enable the entities it accredits to establish eligibility to participate in the Title IV programs.

Table 21 – Accrediting Agencies That Provided Information			
Accrediting Agency	Number of Institutions Accredited	Using Computer Transmission	
		Courses	Programs
Accrediting Association of Bible Colleges	86		
Accrediting Bureau of Health Education Schools (2)			
Accrediting Commission of Career Schools and Colleges of Technology	716	2	2
Accrediting Council for Continuing Education and Training	229	3	3
Accrediting Council for Independent Colleges and Schools (1)	615	15(E)	10(E)
American Academy for Liberal Education	5		0
American Association of Nurse Anesthetists Council on Accreditation of Nurse Anesthesia Educational Programs	83		
American Bar Association Council of the Section of Legal Education and Admissions to the Bar	182		0
American Board of Funeral Service Education Committee on Accreditation	50	4	0
American Dietetic Association Commission on Accreditation/Approval for Dietetics Education	600	0(E)	0(E)
American Osteopathic Association Bureau of Professional Education	19		0(E)
Association of the Theological Schools in the United States and Canada, Committee on Accrediting	237	47	0
Council on Occupational Education	336	9(E)	0
Joint Review Committee on Education in Radiologic Technology	680		
Middle States Association of Colleges and Schools Commission on Higher Education	496	143(E)	92(E)

Montessori Accreditation Council for Teacher Education, Commission on Accreditation	91	0	0
National Accrediting Agency for Clinical Laboratory Sciences (2)			
National Association of Schools of Art and Design National Association of Schools of Dance National Association of Schools of Music National Association of Schools of Theatre, Commissions on Accreditation (2) (3)			
National League for Nursing Accrediting Commission	1784		15(E)
New England Association of Schools and Colleges Commission on Institutions of Higher Education	209		35(E)
New England Association of Schools and Colleges, Commission on Technical and Career Institutions	136	1	5
North Central Association of Colleges and Schools, Commission on Institutions of Higher Education (1)	993	300	106
North Central Association Commission on Schools	130		
Northwest Association of Schools and Colleges, Commission on Colleges	153	100(E)	100(E)
Southern Association of Colleges and Schools Commission on Colleges	784		250(E)
Transnational Association of Christian Colleges and Schools, Accrediting Commission	32	0	0
Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges	137	100(E)	
Western Association of Schools and Colleges, Accrediting Commission for Schools (2)			
Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities (2)			

(1) Site Visit

(2) Provided information regarding requirements only.

(3) National Office for Arts Accreditation in Higher Education provided information for the four related accrediting agencies.

(E) Represents an estimate.

Note: The area is shaded for those agencies that either did not provide the information or indicated that they could not estimate the number.

APPENDIX C

Summary of Agency Rankings for Areas of Concern

Table 22 shows the percentage of state agencies and accrediting agencies that ranked the twelve areas covered by our review as either a high, moderate or low level of concern. The results showed that 70 percent of the state agencies that provided us with information considered educational outcomes a high area of concern. Eighty-seven percent of the accrediting agencies considered student support services a high area of concern.

Table 22 – Rankings for Areas of Concern						
Issues	State Agencies			Accrediting Agencies		
	High %	Moderate %	Low %	High %	Moderate %	Low %
Educational outcomes	70	16	14	83	4	13
Student support services	60	35	5	87	4	9
Curricula	57	32	11	65	9	22
Faculty	65	32	3	65	26	9
Availability of information about institutions	60	35	5	57	30	13
Satisfactory academic progress	61	31	8	52	35	13
Facility, equipment and supplies	54	24	22	36	41	23
Recruiting and admissions policies	54	38	8	39	57	4
Course length	33	33	33	22	43	35
Refund policies	46	32	22	27	37	36
Consortia (a)	33	36	31	30	39	31
Out-of-state institutions offering course and program to state residents	59	27	14	—	—	—

(a) Consortia of two or more institutions that agreed to collaborate on a common effort such as sharing distance education courses.

APPENDIX D

Number of Institutions Using Various Distance Education Methods

Thirty-seven state agencies and 24 accrediting agencies provided us with the actual or estimated number of institutions using distance education methods that the agency licensed/approved. The below table shows the totals (actual and estimated numbers) reported by the agencies by type of distance education method. Institutions that use more than one distance education method are included in each applicable category.

Table 23 – Estimated Number of Institutions Using Various Distance Education Methods		
Description	State Agencies <i>(37 agencies that approved 6,335 institutions)</i>	Accrediting Agencies <i>(24 agencies that accredited 8,783 institutions)</i>
Offer educational programs delivered primarily through computer transmission	269	618
Offer educational courses delivered primarily through computer transmission	482	724
Offer educational programs/courses delivered using television, audio or satellite transmission	131	789
Offer educational programs/courses delivered using video cassettes or discs	65	528
Offer educational programs/courses delivered through correspondence	86	351

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