



Western Association of Schools and Colleges
Accrediting Commission for the Senior Colleges and Universities

Good Practices For Electronically Offered Degree and Certificate Programs

Introduction

These *Good Practices* have been developed by the eight regional accrediting commissions in response to the emergence of technologically mediated instruction offered at a distance as an important component of higher education. Expressing in detail what currently constitutes good practice in distance education they seek to address concerns that regional accreditation standards are not relevant to the new distributed learning environments, especially when those environments are experienced by off-campus students. The *Good Practices*, however, are not new evaluative criteria. Rather they explicate how the well-established essentials of institutional quality found in regional accreditation standards are applicable to the emergent forms of learning; much of the detail of their content would find application in any learning environment. Taken together those essentials reflect the values which the regional commissions foster among their affiliated colleges and universities:

- that education is best experienced within a community of learning where competent professionals are actively and cooperatively involved with creating, providing, and improving the instructional program;
- that learning is dynamic and interactive, regardless of the setting in which it occurs;
- that instructional programs leading to degrees having integrity are organized around substantive and coherent curricula which define expected learning outcomes;
- that institutions accept the obligation to address student needs related to, and to provide the resources necessary for, their academic success;
- that institutions are responsible for the education provided in their name;
- that institutions undertake the assessment and improvement of their quality, giving particular emphasis to student learning;
- that institutions voluntarily subject themselves to peer review.

These *Good Practices* are meant to assist institutions in planning distance education activities and to provide a self-assessment framework for those already involved. For the regional accrediting associations they constitute a common understanding of those elements which reflect quality distance education programming. As such they are intended to inform and facilitate the evaluation policies and processes of each region.

Developed to reflect current best practice in electronically offered programming, these *Good Practices* were initially drafted by the Western Cooperative for Educational Telecommunications (www.wiche.edu/telecom/), an organization recognized for its substantial expertise in this field.

Given the rapid pace of change in distance education, these *Good Practices* are necessarily a work in progress. They will be subject to periodic review by the regionals, individually and collectively, who welcome comments and suggestions for their improvement.

Overview to the *Good Practices*

These *Good Practices* are divided into five separate components, each of which addresses a particular area of institutional activity relevant to distance education. They are:

1. Institutional Context and Commitment
2. Curriculum and Instruction
3. Faculty Support
4. Student Support
5. Evaluation and Assessment

Each component begins with a general statement followed by individual numbered paragraphs addressing specific matters describing those elements essential to quality distance education programming. These in turn are followed by protocols in the form of questions designed to assist in determining the existence of those elements when reviewing either internally or externally distance education activities.

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Good Practices and Protocols

1. Institutional Context and Commitment

Electronically offered programs both support and extend the roles of educational institutions. Increasingly they are integral to academic organization, with growing implications for institutional infrastructure.

1a. In its content, purposes, organization, and enrollment history if applicable, the program is consistent with the institution's role and mission.

- What is the evidence that the program is consistent with the role and mission of the institution including its goals with regard to student access?
- Is the institution fulfilling its stated role as it offers the program to students at a distance, or is the role being changed?

1b. It is recognized that a healthy institution's purposes change over time. The institution is aware of accreditation requirements and complies with them. Each accrediting commission has established definitions of what activities constitute a substantive change that will trigger prior review and approval processes. The appropriate accreditation commission should be notified and consulted whether an electronically offered program represents a major change. The offering of distributed programs can affect the institution's educational goals, intended student population, curriculum, modes or venue of instruction, and can thus have an impact on both the institution and its accreditation status.

- Does the program represent a change to the institution's stated mission and objectives?
- Does the program take the college or university beyond its "institutional boundaries," e.g., students to be served, geographic service area, locus of instruction, curriculum to be offered, or comparable formally stated definitions of institutional purpose?
- Is the change truly significant?

1c. The institution's budgets and policy statements reflect its commitment to the students for whom its electronically offered programs are designed.

- How is the student assured that the program will be sustained long enough for the cohort to complete it?
- How are electronically offered programs included in the institution's overall budget structure?
- What are the institution's policies concerning the establishment, organization, funding, and management of electronically offered programs? Do they reflect ongoing commitment to such programs? (See also item **1e** below.)

1d. The institution assures adequacy of technical and physical plant facilities including appropriate staffing and technical assistance, to support its electronically offered programs.

- Do technical and physical plant facilities accommodate the curricular commitments reviewed below, e.g., instructor and student interaction (**2e**), and appropriateness to the curriculum (**2a**)?
- Whether facilities are provided directly by the institution or through contractual arrangements, what are the provisions for reliability, privacy, safety and security?
- Does the institution's budget plan provide for appropriate updating of the technologies employed?
- Is the staffing structure appropriate (and fully qualified) to support the programs now operational and envisioned in the near term?

1e. The internal organizational structure which enables the development, coordination, support, and oversight of electronically offered programs will vary from institution to institution. Ordinarily, however, this will include the capability to:

- ❖ Facilitate the associated instructional and technical support relationships.
- ❖ Provide (or draw upon) the required information technologies and related support services.
- ❖ Develop and implement a marketing plan that takes into account the target student population, the technologies available, and the factors required to meet institutional goals.
- ❖ Provide training and support to participating instructors and students.
- ❖ Assure compliance with copyright law.
- ❖ Contract for products and outsourced services.
- ❖ Assess and assign priorities to potential future projects.
- ❖ Assure that electronically offered programs and courses meet institution-wide standards, both to provide consistent quality and to provide a coherent framework for students who may enroll in both electronically offered and traditional on-campus courses.
- ❖ Maintain appropriate academic oversight.
- ❖ Maintain consistency with the institution's academic planning and oversight functions, to assure congruence with the institution's mission and allocation of required resources.
- ❖ Assure the integrity of student work and faculty instruction.

Organizational structure varies greatly, but it is fundamental to the success of an institution's programs. The points above can be evaluated by variations of the following procedure and inquiries:

- Is there a clear, well-understood process by which an electronically offered program evolves from conception to administrative authorization to implementation? How is the need for the program determined? How is it assigned a priority among the other potential programs? Has the development of the program incorporated appropriate internal consultation and integration with existing planning efforts?

- Track the history of a representative project from idea through implementation, noting the links among the participants including those responsible for curriculum, those responsible for deciding to offer the program electronically, those responsible for program/course design, those responsible for the technologies applied, those responsible for faculty and student support, those responsible for marketing, those responsible for legal issues, those responsible for budgeting, those responsible for administrative and student services, and those responsible for program evaluation. Does this review reveal a coherent set of relationships?
- In the institution's organizational documentation, is there a clear and integral relationship between those responsible for electronically offered programs and the mainstream academic structure?
- How is the organizational structure reflected in the institution's overall budget?
- How are the integrity, reliability, and security of outsourced services assured?
- Are training and technical support programs considered adequate by those for whom they are intended?
- What are the policies and procedures concerning compliance with copyright law?
- How does program evaluation relate to this organizational and decision-making structure?

1f. In its articulation and transfer policies the institution judges courses and programs on their learning outcomes, and the resources brought to bear for their achievement, not on modes of delivery.

- What are the institution's policies concerning articulation and transfer? What are decisions regarding transfer of academic credit based upon?
- Is the institution internally consistent in its handling of articulation and transfer issues, or do different divisions have different policies and procedures?

1g. The institution strives to assure a consistent and coherent technical framework for students and faculty. When a change in technologies is necessary, it is introduced in a way that minimizes the impact on students and faculty.

- When a student or instructor proceeds from one course or program to another, is it necessary to learn another software program or set of technical procedures?
- When new software or systems are adopted, what programs/processes are used to acquaint instructors and students with them?

1h. The institution provides students with reasonable technical support for each educational technology hardware, software, and delivery system required in a program.

- Is a help desk function realistically available to students during hours when it is likely to be needed?
- Is help available for all hardware, software, and delivery systems specified by the institution as required for the program?
- Does the help desk involve person-to-person contact for the student? By what means, e.g., email, phone, fax?
- Is there a well-designed FAQ (Frequently Asked Questions) service, online and/or by phone menu or on-demand fax?

1i. The selection of technologies is based on appropriateness for the students and the curriculum. It is recognized that availability, cost, and other issues are often involved, but program documentation should include specific consideration of the match between technology and program.

- How were the technologies chosen for this institution's programs?
- Are the technologies judged to be appropriate (or inappropriate) to the program(s) in which they are used?
- Are the intended students likely to find their technology costs reasonable?
- What provisions have been made to assure a robust and secure technical infrastructure, providing maximum reliability for students and faculty?
- Given the rapid pace of change in modern information technology, what policies or procedures are in place to keep the infrastructure reasonably up-to-date?

1j. The institution seeks to understand the legal and regulatory requirements of the jurisdictions in which it operates, e.g., requirements for service to those with disabilities, copyright law, state and national requirements for institutions offering educational programs, international restrictions such as export of sensitive information or technologies, etc.

- Does institutional documentation indicate an awareness of these requirements and that it has made an appropriate response to them?

2. Curriculum and Instruction

Methods change, but standards of quality endure. The important issues are not technical but curriculum-driven and pedagogical. Decisions about such matters are made by qualified professionals and focus on learning outcomes for an increasingly diverse student population.

2a. As with all curriculum development and review, the institution assures that each program of study results in collegiate level learning outcomes appropriate to the rigor and breadth of the degree or certificate awarded by the institution, that the electronically offered degree or certificate program is coherent and complete, and that such programs leading to undergraduate degrees include general education requirements.

- What process resulted in the decision to offer the program?
- By what process was the program developed? Were academically qualified persons responsible for curricular decisions?
- How were “learning outcomes appropriate to the rigor and breadth of the degree or certificate awarded” established? Does the program design involve the demonstration of such skills as analysis, comprehension, communication, and effective research?
- Is the program “coherent and complete?”
- Are related instructional materials appropriate and readily accessible to students?

2b. Academically qualified persons participate fully in the decisions concerning program curricula and program oversight. It is recognized that traditional faculty roles may be unbundled and/or supplemented as electronically offered programs are developed and presented, but the substance of the program, including its presentation, management, and assessment are the responsibility of people with appropriate academic qualifications.

- What were the academic qualifications of those responsible for curricular decisions, assessment, and program oversight?
- What are the academic qualifications of those presenting and managing the program?
- If the principal instructor is assisted by tutors or student mentors, what are their qualifications?
- Are these qualifications considered appropriate to the responsibilities of these persons?

2c. In designing an electronically offered degree or certificate program, the institution provides a coherent plan for the student to access all courses necessary to complete the program, or clearly notifies students of requirements not included in the electronic offering. Hybrid programs or courses, mixing electronic and on-campus elements, are designed to assure that all students have access to appropriate services. (See also **2d** below, concerning program elements from consortia or contract services.)

- How are students notified of program requirements?
- If the institution relies on other providers to offer program-related courses, what is the process by which students learn of these courses?
- Is the total program realistically available to students for whom it is intended? For example, is the chosen technology likely to be accessible by the target student population? Can target students meet the parameters of program scheduling?

2d. Although important elements of a program may be supplied by consortial partners or outsourced to other organizations, including contractors who may not be accredited, the responsibility for performance remains with the institution awarding the degree or certificate. It is the institution in which the student is enrolled, not its suppliers or partners, that has a contract with the student. Therefore, the criteria for selecting consortial partners and contractors, and the means to monitor and evaluate their work, are important aspects of the program plan. In considering consortial agreements, attention is given to issues such as assuring that enhancing service to students is a primary consideration and that incentives do not compromise the integrity of the institution or of the educational program. Consideration is also given to the effect of administrative arrangements and cost-sharing on an institution's decision-making regarding curriculum.

Current examples of consortial and contractual relationships include:

- ❖ Faculty qualifications and support.
- ❖ Course material:
 - Courses or course elements acquired or licensed from other institutions.
 - Courses or course elements provided by partner institutions in a consortium.
 - Curricular elements from recognized industry sources, e.g., Microsoft or Novell certification programs.
 - Commercially produced course materials ranging from textbooks to packaged courses or course elements.
- ❖ Course management and delivery:
 - WebCT, Blackboard, College, etc.
- ❖ Library-related services:
 - Remote access to library services, resources, and policies.
 - Provision of library resources and services, e.g., online reference services, document delivery, print resources, etc.
- ❖ Bookstore services.
- ❖ Services providing information to students concerning the institution and its programs and courses.
- ❖ Technical services:
 - Server capacity.
 - Technical support services, including help desk services for students and faculty.
- ❖ Administrative services:
 - Registration, student records, etc.
- ❖ Services related to orientation, advising, counseling, or tutoring.
- ❖ Online payment arrangements.
- ❖ Student privacy considerations.

Evaluation of contract services and consortial arrangements requires a review of pertinent formal agreements. Note, for example:

- Are performance expectations defined in contracts and agreements? Are conditions for contract termination defined?
- Are there adequate quality control and curriculum oversight provisions in agreements concerning courseware?
- Are there appropriate system reliability and emergency backup guarantees in agreements concerning technology services?
- What are the provisions for protection of confidentiality and privacy in services involving personal information?
- What are the assurances concerning qualifications and training of persons involved in contact with students? These services may range from help desk to tutoring or counseling.
- Consortial agreements introduce additional elements to be evaluated:
 - How are curriculum-related decisions made by the consortium, noting the requirement that “Academically qualified persons participate fully in the decisions regarding program curricula and program oversight?”
 - Is the institution fully engaged in the consortial process, recognizing the decision-making responsibilities of shared ownership?
 - What are the financial arrangements among the parties to the consortial agreement? What are the implications of these arrangements for institutional participation and management?
 - What entity awards the certificates and degrees resulting from the consortial program?
 - What articulation and transfer arrangements are applicable to courses offered via the consortium? Did these arrangements involve specific curricular decisions by the academic structures of the participating institutions? Were they prescribed in a state or system decision?
 - To what extent are the administrative and student services arrangements of the consortium focused on the practical requirements of the student?

<p>2e. The importance of appropriate interaction (synchronous or asynchronous) between instructor and students and among students is reflected in the design of the program and its courses, and in the technical facilities and services provided.</p>
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- What provisions for instructor-student and student-student interaction are included in the program/course design and the course syllabus? How is appropriate interaction assured?
- Is instructor response to student assignments timely? Does it appear to be appropriately responsive?
- What technologies are used for program interaction (e.g., email, telephone office hours, phone conferences, voicemail, fax, chat rooms, Web-based discussions, computer conferences and threaded discussions, etc.)?
- How successful is the program’s interactive component, as indicated by student and instructor surveys, comments, or other measures?

3. Faculty Support

As indicated above, faculty roles are becoming increasingly diverse and reorganized. For example, the same person may not perform both the tasks of course development and direct instruction to students. Regardless of who performs which of these tasks, important issues are involved.

3a. In the development of an electronically offered program, the institution and its participating faculty have considered issues of workload, compensation, ownership of intellectual property resulting from the program, and the implications of program participation for the faculty member's professional evaluation processes. This mutual understanding is based on policies and agreements adopted by the parties.

- Have decisions regarding these matters been made in accordance with institutional or system processes customarily used to address comparable issues?

3b. The institution provides an ongoing program of appropriate technical, design, and production support for participating faculty members.

- What support services are available to those responsible for preparing courses or programs to be offered electronically? What support services are available to those faculty members responsible for working directly with students?
- Do participating faculty members consider these services to be appropriate and adequate?
- Does the staff include qualified instructional designers? If so, do they have an appropriate role in program and course development?

3c. The institution provides to those responsible for program development the orientation and training to help them become proficient in the uses of the program's technologies, including potential changes in course design and management.

- What orientation and training programs are available? Are there opportunities for ongoing professional development?
- Is adequate attention paid to pedagogical changes made possible and desirable when information technologies are employed?
- Given the staff available to support electronically offered programs, are the potential changes in course design and management realistically feasible?
- Do those involved consider these orientation and training programs to be appropriate and adequate?

3d. The institution provides to those responsible for working directly with students the orientation and training to help them become proficient in the uses of the technologies for these purposes, including strategies for effective interaction.

- What orientation and training programs are available? Are there opportunities for ongoing professional development? Do those involved consider these orientation and training programs to be appropriate and adequate?

4. Student Support

Colleges and universities have learned that the twenty-first century student is different, both demographically and geographically, from students of previous generations. These differences affect everything from admissions policy to library services. Reaching these students, and serving them appropriately, are major challenges to today's institutions.

4a. The institution has a commitment – administrative, financial, and technical – to continuation of the program for a period sufficient to enable all admitted students to complete a degree or certificate in a publicized timeframe.

- Do course and program schedules reflect an appropriate commitment to the program's students?
- Do budget, faculty, and facilities assignments support that commitment?

4b. Prior to admitting a student to the program, the institution:

- ❖ Ascertains by a review of pertinent records and/or personal review that the student is qualified by prior education or equivalent experience to be admitted to that program, including in the case of international students, English language skills.
- ❖ Informs the prospective student concerning required access to technologies used in the program.
- ❖ Informs the prospective student concerning technical competence required of students in the program.
- ❖ Informs the prospective student concerning estimated or average program costs (including costs of information access) and associated payment and refund policies.
- ❖ Informs the prospective student concerning curriculum design and the time frame in which courses are offered, and assists the student in understanding the nature of the learning objectives.

4b. continued

- ❖ Informs the prospective student of library and other learning services available to support learning and the skills necessary to access them.
- ❖ Informs the prospective student concerning the full array of other support services available from the institution.
- ❖ Informs the prospective student about arrangements for interaction with the faculty and fellow students.
- ❖ Assists the prospective student in understanding independent learning expectations as well as the nature and potential challenges of learning in the program's technology-based environment.
- ❖ Informs the prospective student about the estimated time for program completion.

To evaluate this important component of admission and retention, it is appropriate to pursue the following:

- How do potential students learn about the electronically offered program? Is the information provided sufficient, fair, and accurate?
- How are students informed about technology requirements and required technical competence?
- How are students informed about costs and administrative arrangements?
- What information and/or advice do students receive about the nature of learning and the personal discipline required in an anytime/anywhere environment?
- What criteria are used to determine the student's eligibility for admission to the program?
- What steps are taken to retain students in the program?
- What is the history of student retention in this program?

4c. The institution recognizes that appropriate services must be available for students of electronically offered programs, using the working assumption that these students will not be physically present on campus. With variations for specific situations and programs, these services, which are possibly coordinated, may include:

- ❖ Accurate and timely information about the institution, its programs, courses, costs, and related policies and requirements.
- ❖ Pre-registration advising.
- ❖ Application for admission.
- ❖ Placement testing.
- ❖ Enrollment/registration in programs and courses.
- ❖ Financial aid, including information about policies and limitations, information about available scholarships, processing of applications, and administration of financial aid and scholarship awards.

4c. continued

- ❖ Secure payment arrangements.
- ❖ Academic advising.
- ❖ Timely intervention regarding student progress.
- ❖ Tutoring.
- ❖ Career counseling and placement.
- ❖ Academic progress information, such as degree completion audits.
- ❖ Library resources appropriate to the program, including, reference and research assistance; remote access to data bases, online journals and full-text resources; document delivery services; library user and information literacy instruction, reserve materials; and institutional agreements with local libraries.
- ❖ Training in information literacy including research techniques.
- ❖ Bookstore services: ordering, secure payment, and prompt delivery of books, course packs, course-related supplies and materials, and institutional memorabilia.
- ❖ Ongoing technical support, preferably offered during evenings and weekends as well as normal institutional working hours.
- ❖ Referrals for student learning differences, physical challenges, and personal counseling.
- ❖ Access to grievance procedures.

Within the context of the program, the requirements of the program's students, and the type of institution, review each of the services and procedures listed above from the standpoint of a student for whom access to the campus is not feasible.

- Are the institution's policies and procedures appropriate and adequate from the standpoint of the distant student?
- If not all appropriate resources are routinely available at a distance, what arrangements has the institution made to provide them to distant students?
- Are these services perceived by distant students to be adequate and appropriate?
- Are these services perceived to be adequate and appropriate by those responsible for providing them? What modifications or improvements are planned?

4d. The institution recognizes that a sense of community is important to the success of many students, and that an ongoing, long-term relationship is beneficial to both student and institution. The design and administration of the program takes this factor into account as appropriate, through such actions as encouraging study groups, providing student directories (with the permission of those listed), including off-campus students in institutional publications and events, including these students in definitions of the academic community through such mechanisms as student government representation, invitations to campus events including graduation ceremonies, and similar strategies of inclusion.

- What strategies and practices are implemented by this institution to involve distant students as part of an academic community? By their statements and actions, do administrators and participating faculty members communicate a belief that a sense of academic community is important?
- How are the learning needs of students enrolled in electronically offered programs identified, addressed, and linked to educational objectives and learning outcomes, particularly within the context of the institution's definition of itself as a learning community.
- Do representative students feel that they are part of a community, or that they are entirely on their own?

5. Evaluation and Assessment

Both the assessment of student achievement and evaluation of the overall program take on added importance as new techniques evolve. For example, in asynchronous programs the element of seat time is essentially removed from the equation. For these reasons, the institution conducts sustained, evidence-based and participatory inquiry as to whether distance learning programs are achieving objectives. The results of such inquiry are used to guide curriculum design and delivery, pedagogy, and educational processes, and may affect future policy and budgets and perhaps have implications for the institution's roles and mission.

5a. As a component of the institution's overall assessment activities, documented assessment of student achievement is conducted in each course and at the completion of the program, by comparing student performance to the intended learning outcomes.

- How does the institution review the effectiveness of its distance education programs to assure alignment with institutional priorities and educational objectives?
- How does evaluated student performance compare to intended learning outcomes?
- How is student performance evaluated?
- How are assessment activities related to distance learning integrated into the institution's broader program of assessment?

5b. When examinations are employed (paper, online, demonstrations of competency, etc.), they take place in circumstances that include firm student identification. The institution otherwise seeks to assure the integrity of student work.

- If proctoring is used, what are the procedures for selecting proctors, establishing student identity, assuring security of test instruments, administering the examinations, and assuring secure and prompt evaluation?
- If other methods are used to identify those who take the examination, how is identification firmly established? How are the conditions of the examination (security, time limits, etc.) controlled?
- Does the institution have in place effective policies and procedures to assure the integrity of student work?

5c. Documented procedures assure that security of personal information is protected in the conduct of assessments and evaluations and in the dissemination of results.

- What procedures assure the security of personal information?
- How is personal information protected while providing appropriate dissemination of the evaluation results?

5d. Overall program effectiveness is determined by such measures as:

- ❖ The extent to which student learning matches intended outcomes, including for degree programs both the goals of general education and the objectives of the major.
- ❖ The extent to which student intent is met.
- ❖ Student retention rates, including variations over time.
- ❖ Student satisfaction, as measured by regular surveys.
- ❖ Faculty satisfaction, as measured by regular surveys and by formal and informal peer review processes.
- ❖ The extent to which access is provided to students not previously served.
- ❖ Measures of the extent to which library and learning resources are used appropriately by the program's students.
- ❖ Measures of student competence in fundamental skills such as communication, comprehension, and analysis.
- ❖ Cost effectiveness of the program to its students, as compared to campus-based alternatives.

Although not all of these measures will be applicable equally at every institution, appropriate evidence is generally available through:

- Evaluations of student performance (see **5a** above).
- Review of student work and archive of student activities, if maintained, in the course of program reviews.
- Results from students' routine end-of-course and -program evaluations.
- Student surveys of overall satisfaction with the experience of electronically offered programs; surveys reflecting student cost trade-offs experienced as they pursued the program.
- Faculty surveys, peer reviews of programs, and discussion groups.
- Documentation concerning access provided to students not previously served, through a combination of enrollment records and student surveys.
- Usage records concerning use of library and learning resources, and instructor assignments that require such usage.
- Assessment of students' fundamental skills in communication, comprehension, and analysis. How have the institution's usual measures of these skills been adapted to assess distant students?
- Documentation of the institution's analyses that relate costs to goals of the program.

5e. The institution conducts a program of continual self-evaluation directed toward program improvement, targeting more effective uses of technology to improve pedagogy, advances in student achievement of intended outcomes, improved retention rates, effective use of resources, and demonstrated improvements in the institution's service to its internal and external constituencies. The program and its results are reflected in the institution's ongoing self-evaluation process and are used to inform the further plans of the institution and those responsible for its academic programs.

- How is the institution's ongoing program of assessment and improvement developed and conducted?
- Does it cover the essential categories of improved learning outcomes, retention, use of resources, and service to core constituencies?
- Does the program appropriately involve academically qualified persons?
- What are the institution's mechanisms for review and revision of existing programs and courses?
- How does program evaluation affect institutional planning?
- What constituencies are actively involved in the ongoing process of planning for improvement?
- Has the process had measurable results to date?

5f. Institutional evaluation of electronically offered programs takes place in the context of the regular evaluation of all academic programs.

- What are the administrative and procedural links between the evaluation of electronically offered programs and the ongoing evaluation of all academic programs?
- How are the respective characteristics of campus-based and electronically offered programs taken into account?