

National Advisory Committee on Institutional Quality and Integrity (NACIQI)
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW, Room 2C-159,
Washington, DC 20202

Dear Chairman Kesier and Members of the Committee:

Re: 86 FR 33995

Thank you for the opportunity to provide comments regarding the July 2021 National Advisory Committee on Institutional Quality and Integrity (NACIQI) meeting. Higher Learning Advocates (HLA) is a non-profit organization working to shift federal policy from higher education to higher learning—education and training beyond high school that leads to a degree, credential, or employment. With more students participating in higher education than ever before, we strive to strengthen the connection between federal policy and the needs of today’s students, employers, and communities.

As the country is emerging from the global coronavirus pandemic where college campuses throughout the country shuttered abruptly and where postsecondary students were forced to switch to emergency remote instruction, and subsequently, increased distance education courses, we believe NACIQI should continue to monitor this switch to a more remote postsecondary landscape. Fifty-one percent of students were learning online in the Fall of 2020 and experienced new challenges like broadband access—where 57 percent of students reported that accessing a stable, high-speed internet connection was a challenge¹—and reported that remote learning made it harder to stay interested in course content and to collaborate with other students.²

As you are aware, the initial scramble to move in-person classes to an online environment can best be categorized as “emergency remote learning,” where faculty and instructors did what was necessary in efforts to keep students learning after unexpected campus closures. But emergency remote learning stands in stark contrast to “distance education”—the term as defined by the Higher Education Act to mean “high-quality education delivered by instructors via various technologies that support regular and substantive interaction with the student.”

As challenges related to the coronavirus pandemic persist, and as more than 30 percent of students have signaled that they would like to continue learning online for the foreseeable future³, institutions and accreditors must make every effort to ensure that distance learning being offered meets the high quality benchmarks as dictated by the Higher Education Act and related regulations in order to ensure today’s students are being offered high-quality instruction and valuable postsecondary programs.

As such, it is imperative that NACIQI utilize its oversight authority to ensure programs now offered online maintain a high quality of education and satisfy appropriate distance education requirements. To that note, we recommend NACIQI work with accreditors and that accreditors conduct a survey of institutions under their portfolio to assess the following:

1. The actions institutions took in 2020 during the switch to distance education programs and how institutions monitored quality in such programs;

¹ <http://thirdway.imgix.net/New-America-and-Third-Way-Higher-Ed-Student-Polling-Data.pdf>

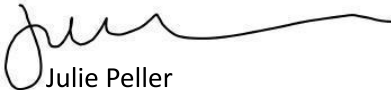
² https://digitalpromise.org/wp-content/uploads/2020/07/ELE_CoBrand_DP_FINAL_3.pdf

³ <https://cci.stradaeducation.org/pv-release-july-29-2020/>

2. The steps institutions are currently taking to ensure quality of distance education or hybrid programs; and,
3. How institutions intend to uphold the quality of distance education programs for the future.

We believe such a survey will best inform institutions, accrediting agencies, and NACIQI on how to best ensure that the high standards required by distance education regulations continue to be prevalent for today's students in an increasingly online learning environment. Thank you for your attention to our views on these matters. Higher Learning Advocates stands ready to assist NACIQI on these matters and others related to high-quality learning for today's students.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie Peller', with a long horizontal flourish extending to the right.

Julie Peller
Executive Director
Higher Learning Advocates