Substantive Change Report
for Staff Review

Proposal Information:

<table>
<thead>
<tr>
<th>Proposal Review Date</th>
<th>November 29, 2021</th>
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<tbody>
<tr>
<td>Institution</td>
<td>Pardee Rand Graduate School</td>
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<tr>
<td>Type of Substantive Change</td>
<td>Institutional Approval for Distance Education</td>
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<tr>
<td>ALO</td>
<td>Rachel Swanger</td>
</tr>
<tr>
<td>WSCUC Staff</td>
<td>Karen Graham</td>
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</tbody>
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Staff Action and Date:

Approved on 11/29/2021

Staff Findings:

Commendations:
None

Recommendations:

1. To Clarify -- If it is possible for a student to complete a degree program (General Education & Major requirements) by using 50% or more online courses, the degree program would need Program Approval as a Distance Education offering even if taken by a single student. [US DOE 34 C.F.R. § 668.8(m)]

2. The institution is advised to include in their assessment of distance education a protocol that compares student learning between online delivery of a course and on-ground delivery of the same course. Findings should enable pedagogical or instructional design revisions. [WSCUC CFR 4.1]

3. The institution must provide faculty training in online pedagogy and instructional design and monitor and assess instructor’s understanding and use of best practice pedagogy and instructional design when teaching online. [WSCUC CFRs 3.3, 3.5]

4. If a student is approved to take an occasional online course, the institution must show evidence that it provides orientation and support for that instructional modality. For any student approved to enroll in an online course at the institution, the institution’s support services must be ready to provide all services by convenient accessibility and timely response from those services. [WSCUC CFRs 2.1, 2.13]

5. In addition to password verification, the institution should continue monitoring new and innovative methods of assuring authenticity for any student using distance education at any level of instruction and assignment submission. [WSCUC CFRs 1.7, 3.5]

6. Program faculty and administration should continue to develop standardized protocols for ensuring “regular, substantive, faculty-initiated interaction” with students as well as specific monitoring strategies that provide evidence of that interaction in online instruction. [WSCUC CFR 2.5]

Retain this document and attachments for your permanent records.
7. The institution must clearly identify which activities designed in a distance education course are counted toward the Credit Hour Policy requirement of direct instruction and which activities constitute independent learning hours as regulated by the DOE Credit Hour Policy. [WSCUC CFRs 1.7, 2.1, 2.2]

Additional Information:

Notification of Implementation:
This approval does not confer approval for individual distance education programs. If a program offered by the institution allows for a student to complete 50% or more of the program through distance education, it must be approved as a Substantive Change by WSCUC.

WSCUC Liaison Signature:

Date: 1/3/2022