PALO VERDE COLLEGE
1 College Drive
Blythe, CA 92225
(760) 921-5500

SUBSTANTIVE CHANGE PROPOSAL

PROPOSAL FOR SUBSTANTIVE CHANGE IN DELIVERY METHODOLOGY: CORRESPONDENCE EDUCATION

Prepared by

Brian Thiebaux, Accreditation Liaison Officer/Institutional Researcher/
Professor of English and Business

Submitted to the Accrediting Commission for Community and Junior Colleges

February 9, 2012

TABLE OF CONTENTS

Page

Introduction: Board of Trustees' Approval of the Distance Learning Program 5

A. Description of the change and the reasons for it 7

1. Brief description

2. Evidence of a clear relationship to the College's mission

3. Rationale for the change

B. Description of the change in terms of delivery mode 9

1. Educational purposes of the change are clear and appropriate

2. The proposed program meets Eligibility Requirements, Accreditation Standards and Commission Policies related to Student Learning Programs and Services and Resources

C. Planning process leading to the change 10

1. The change's relationship to the institution's planning, evaluation and stated mission

2. The assessment of needs and resources which has taken place

3. The anticipated effect of the proposed change on the rest of the institution

4. A clear statement of the intended benefits that will result from the change

5. A description of the preparation and planning process for the change

D. Evidence that the institution has analyzed and provided for adequate human, administrative, financial and physical resources and processes necessary to initiate, maintain, and monitor the change and to assure that the activities undertaken are accomplished with acceptable quality, including: 12

Page

1. Adequate and accessible student support services; enumerate services as detailed as possible; provide electronic links where available

2. Sufficient and qualified faculty, management, and support staffing

3. Professional development for faculty and staff to effect the change

4. Appropriate equipment and facilities, including adequate control over any off-campus site

5. Sustainable fiscal resources including the initial and long-term amount and sources of funding for the proposed change and an analysis of fiscal impact on the institution's budget

6. A comparative analysis of the budget, enrollment and resources; identify new or reallocated funds

7. A plan for monitoring achievement of the desired outcomes of the proposed change

8. Evaluation and assessment of student success, retention and completion

E. Evidence that the institution has received all necessary internal or external approvals, including: 17

1. A clear statement of what faculty, administrative, governing board, or regulatory agency approvals are needed, and evidence that they have been obtained

2. Legal requirements have been met

3. Governing board action to approve the change and any budget detail supporting the change

F. Evidence that each Eligibility Requirement will still be fulfilled specifically related to the change 18

1. Requirements that are particularly impacted by the change should be addressed in detail

G. Evidence that each Accreditation Standard will still be fulfilled specifically related to the change and that all relevant Commission policies are addressed 23

1. Standards that are particularly impacted by the change should be addressed in detail. There should be a description of the process for monitoring and evaluating the effectiveness and learning outcomes expected through the proposed change

2. Depending on the nature of the proposed change, the Commission may ask for more detailed information to assist the staff and the Committee on Substantive Change in their review

3. Failure to address Eligibility Requirements, Accreditation Standards and Commission policies could result in the proposal being considered incomplete or rejected

List of Supporting Documents 33

Supporting Documents, by tabs labeled A through T

PROPOSAL FOR SUBSTANTIVE CHANGE IN DELIVERY METHODOLOGY: CORRESPONDENCE EDUCATION

Introduction and Evidence of Board of Trustees' Approval of the Correspondence Education Program

Palo Verde College has been asked by the ACCJC to prepare a proposal for substantive change in course delivery methodology. The College understands that substantive change in course delivery methodology occurs when at least 50% of course requirements for a degree or certificate program may be satisfied through an instructional delivery methodology that is new for the College or program. For Palo Verde College, the instructional methodology representing a substantive change is correspondence education.[1] While correspondence education is already in place—it was initiated in Spring 2001—and 50% of the requirements of many degrees and certificates may now be earned in correspondence education, the College recognizes the requirement to comply with ACCJC substantive change policies and rules.[2]

The proposal, therefore, is less a statement about a delivery methodology the College *intends* to undertake, and more a narrative describing a methodology *already established,* addressing how it is performing, the educational benefits it provides to students and the community and other matters required by the ACCJC's accreditation and substantive change policies and rules.[3]
As of the 2011-12 academic year, 50% of the requirements, measured by semester units, of the following degrees and certificates may be satisfied through correspondence education:

---

[1] This proposal uses the term "correspondence education" consistent with the definitions of these terms used in the Policy on Distance Education and on Correspondence Education, ACCJC, June 2011, and the Substantive Change Manual, ACCJC, June 2011, pp. 11-12. Some documents supporting this proposal may contain different terminologies, such as "distance education" or "distance learning" when referring to correspondence education. Although the College does deliver some courses in distance education modes, namely, interactive television and online instruction, these courses do not constitute 50% of the requirements for any degrees and certificates currently offered by the College and, therefore, are not a part of the proposal.

[2] Although the College has not previously submitted a proposal for substantive change in delivery methodology, the existence of correspondence programs has been thoroughly documented in several accreditation reports, including two Self-Studies, in 2002 and 2008, annual reports to the ACCJC, and the Evaluation Report (Visiting Team), March 2002, pp. 14 and 18, and Evaluation Report, March 2008, p. 4 (Supporting Documents, A and B)

[3] The need for the substantive change proposal is described in the letter to Susan Clifford, Vice-President, ACCJC, from Brian Thiebaux, Accreditation Liaison Officer, June 28, 2011 (Supporting Documents, C)

Associates in Science

Automotive Technology
Building Construction Technology
Business Management
Child Development
Criminal Justice
Welding Technology

Associates in Arts

Arts and Humanities
Business and Technology
Mathematics and Science
Social and Behavioral Science
Sociology
Psychology

Certificates of Achievement

Alcohol and Drug Studies
Business Management

Certificates of Career Preparation

Alcohol and Drug Studies Specialist I
Alcohol and Drug Studies Specialist II
Business Literacy
Information Technology Literacy
Management Information Systems

Since its inception, the correspondence education program has earned the support, endorsement and approval of the Palo Verde College Board of Trustees, as evidenced by the following actions[4]:

New position for Assistant Dean of Distance Learning Programs (including state prisons), Resolution 01-0 C-35, May 22 2001

Employment of Assistant Dean of Distance Education Programs (including state prisons), Resolution 012 C-67, July 24, 2001

[4] These and other documents cited in this proposal are available, by attachment, in their full or excerpted text (Supporting Documents, D)

Acceptance of the Distance Education Program Review Report, Resolution 08-08 A-11, May 13, 2008

Revised Board Policy 4105, Distance Learning, Resolution 10-13 D-23, October 26, 2010; also presented as information items: Administrative Procedure 4105 Distance Education; Administrative Procedure 4105-1 Distance Education—Interactive Television (ITV) Courses; Administrative Procedure 4105-2 Correspondence Education[5]

A. Description of the change and the reasons for it

1. Brief description

Here is a chronology of the development of the College's correspondence education program:

Spring 2001—College starts the "distance education" program, in correspondence mode, principally serving inmates housed at two state prisons approximately 20 miles from the main campus in Blythe. Initial enrollment is 53 incarcerated students plus a small number of "community students" (a College term referring to students enrolled in correspondence courses, who are not incarcerated).

2001—College creates a new position of Assistant Dean of Distance Education to manage the program. Program expands, with authority of a memorandum of understanding with the California Department of Corrections, to include other correctional facilities outside the College district, within California.

2007—College hires a new counselor whose responsibilities include providing academic counseling to inmates at all participating correctional facilities. National Geographic Channel presents a one-hour documentary about the California community colleges' inmate education program, with mention of Palo Verde College.

2007—College reports in its 2007 Annual Report to the ACCJC that a limited number of certificates and degrees may be earned through correspondence courses. Unfortunately, the College was not aware that it had to submit a Substantive Change Proposal—an error which, hopefully, it is making up for in the present proposal.[6]
2008—Office of Distance Education prepares its first program review.[7]

[5] Board Policies and Administrative Procedures, BP 4105, AP 4105, 4105-1, 4105-2 (Supporting Documents, E)

[6] 2006-07 Accreditation Annual Report, May 18, 2007 (Supporting Documents, F)

[7] Program Review Report, Office of Distance Education, May 2008 (Supporting Documents, G). The Office of Distance Education subsequently changed its name to the Office of Distance Learning to avoid confusion with California Education Code and ACCJC terminologies and to acknowledge the fact that it administers programs in both correspondence education and distance education. Hereafter in this proposal, the office will be referred to as the Office of Distance Learning.

2008—National Geographic Channel presents a follow-up documentary on the California inmate education program.

2010—College's Curriculum Committee adopts a revised course outline-of-record template, which includes separate parts dealing with face-to-face and correspondence education delivery methodologies.

Present—In Fall Semester 2011, the College offers 116 course sections in correspondence education. The College provides correspondence education to 15 correctional facilities in California, serving approximately 800 incarcerated students. Approximately, one-third of the College's students, incarcerated and community, are enrolled in at least one correspondence course.

2. Evidence of a clear relationship to the College's mission

The College's mission statement is as follows:

"Palo Verde College is a California community college that provides an exemplary learning environment with high quality educational programs and services. It promotes student success, lifelong learning and community development. Our goal is to create better futures for our students and our communities."

The College's correspondence courses, like their face-to-face counterparts, offer students exemplary learning environments in which they can work to create better futures for themselves. For incarcerated students, the correspondence program is the only way they can acquire a college education and improve their lives once they are released. For community students, correspondence education provides options to integrate their college work with the demands of jobs and family.

3. Rationale for the change

The need for the program was recognized prior to 2001-02 when the college realized there was a large population of incarcerated persons residing in correctional facilities within the district that was underserved by the college. As the program grew and the college gained expertise in working with incarcerated students and prison system personnel, other California prison facilities joined in the program.

Today, approximately one-third of Palo Verde College students, incarcerated and community, are enrolled in at least one correspondence course. For incarcerated students, the correspondence program is the only way they can enroll in courses and earn degrees and certificates; for community students, correspondence courses provide the opportunity to complete college courses and programs while meeting the competing demands of jobs and family.

B. Description of the change in terms of delivery methodologies

1. Educational purposes of the change are clear and appropriate

The educational purposes of the correspondence program are identical to the purposes of traditional face-to-face course sections, namely, to provide students with opportunities to acquire a 2-year college education with the intention to transfer to four-year institutions; to enhance employability; and to acquire and enhance job skills.

2. The proposed program meets Eligibility Requirements, Accreditation Standards and Commission Policies related to Student Learning Programs and Services and Resources

Since the inception of correspondence education in 2001, the College has completed one accreditation cycle (2002 to 2008) and is currently at the mid-point of another (2008-2014). The start-up and development of the correspondence education program occurred within these time periods and was discussed in considerable detail in both self-study reports (2002 and 2008) as well as in accrediting team reports, follow-up reports and accreditation annual reports.

Except for one recommendation, made in 2002, the correspondence program has, from the standpoint of the ACCJC and the College, satisfied Eligibility Requirements, accreditation standards, and Commission policies.

The one visiting team recommendation regarding correspondence education reads as follows:

"The College [should] review its learning support services for students at off campus sites, in order to provide comparable access to information and learning resources to support the courses, programs and degrees offered at these sites."[8]

The College responded to this recommendation in the Focused Midterm Accreditation Report in 2005, citing improvements made by the College to provide academic advising support to students at the Needles Center, incarcerated students, and community students enrolled in correspondence courses.[9]

The College followed up on this recommendation in the Self-Study report of 2008, describing further improvements at the Needles Center in the area of counseling services, tutoring and academic counseling support for incarcerated students, and

[8] Evaluation Report, Palo Verde College, Team Recommendation #6, March 20-22, 2002, p. 21 (Supporting Documents, A)

[9] Focused Midterm Accreditation Report, Palo Verde College, 2005, pp. 13-14 (Supporting Documents, H)

counseling support for students enrolled in specialized instructional programs conducted in areas outside the district.[10]

The correspondence education program also received visiting team commendations in 2002 and 2008.[11]

C. Planning process leading to the change

1. The change's relationship to the institution's planning, evaluation and stated mission

Correspondence education has become fully integrated into the College's planning and evaluation processes, and is consistent with the College's mission as stated in the response to item A.2, earlier in this report.

Evidence of the integration of correspondence education into the planning and evaluation processes of the College includes these examples:

a. Creation of the position of Assistant Dean of Distance Education, in 2001, whose initial charge is to manage the correspondence education programs, principally those offered at two nearby state prisons.[12] Later, the position responsibilities expanded to include ITV and online courses, as well as correspondence courses and support services.[13]

b. Formation of the Distance Education Committee, initially as an Academic Senate Committee, in 2004, and later as a mutual agreement committee broadening committee membership to include all College constituencies. The committee is charged with planning and evaluating distance learning programs (ITV and online, as well as correspondence) and their delivery from an institution-wide standpoint.

c. Inclusion of the Dean of Distance Learning as part of the College Council/Strategic Planning Steering Committee, the key planning committee of the College with representatives from all constituent groups

d. The presentation of its first program review report by the Office of Distance Learning , in 2008, and acceptance by the Board of Trustees

[10] Report of the Institutional Self-Study for Reaffirmation of Accreditation, Palo Verde College, 2008, pp. 36-37 (Supporting Documents, I)

[11] Evaluation Report 2002, Commendation #5 , p.3 and Evaluation Report 2008, p. 4 (Supporting Documents, A and B)

[13] The position title, "Assistant Dean" was changed to "Dean" in 2010.

e. The revision of the course outline-of-record to incorporate courses that are taught in face-to-face, correspondence and distance education methodologies[14]

f. The adoption by the Board of Trustees of policies and administrative procedures governing correspondence education[15]

2. The assessment of needs and resources which has taken place

The correspondence education program is continuously being assessed as to its needs and resources. Here are a few examples of the results of these assessments:

a. The expansion of counseling and tutoring support services by the Learning Skills Center at the Blythe main campus and at the prison sites in response to evolving correspondence education needs, which has been addressed earlier in this report, sections A.1 and B.2

b. Several Flex Day programs have been devoted, at least in part, to addressing faculty training needs in correspondence education delivery.[16]

3. The anticipated effect of the proposed change on the rest of the institution

Correspondence education has had a significant impact on the rest of the institution. The increase in enrollment has been extremely beneficial to the College, but higher enrollment has required increases in faculty and staffing to provide instructional and support services, including the formation of an administrative unit, the Office of Distance Education, to manage the program.

Nonetheless, correspondence education has, on balance, provided benefits by expanding the College's diversity, providing faculty with opportunities to teach in a new methodology, increasing FTES production and providing instructional and support services to a previously underserved population in the district, namely, prison inmates.

4. A clear statement of the intended benefits that will result from the change

The benefits to the College, as noted in section C.3 above, include expanding the College's diversity, providing faculty with opportunities to teach in a new

[14] Course outline-of-record, December 2010 (Supporting Documents, J)

[15] Board of Trustees' Policies and Administrative Procedures, BP 4105 and AP 4105, 4105-1 and 4105-2 (Supporting Documents, E)

[16] Flex Day Agendas for August 20, 2007; January 14, 2008; August 20, 2008; March 18, 2009; and February 11, 2011 all of which have one or more presentations devoted to training in correspondence education teaching methods (Supporting Documents, K)

methodology, increasing FTES production and providing instructional and support services to a previously underserved population in the district, namely, prison inmates. Courses offered through correspondence education provide students with more options to integrate their college work with the demands of jobs and family.

5. A description of the preparation and planning process for the change

Correspondence education began with a very small number of students and faculty members participating. Consequently, planning and preparation focused on a few specific matters of great importance at the time, namely, the quality of correspondence instruction, the logistics of timely delivery of course materials, procedural agreements between the College and the prisons, managerial and counseling support, and collective bargaining issues related to class size and policies affected by intellectual property rights.[17]

As the program grew, the College implemented more formalized administrative support with the increased staffing of the Office of Distance Learning with counseling and clerical support, and with the hiring of additional full-time and part-time faculty.

In 2010, the College's Curriculum Committee revised the course outline-of-record template to incorporate course information for courses face-to-face, distance education and correspondence education delivery methodologies.[18]

Each phase in the development of the correspondence education program required the planning and preparation efforts of several College organizations, including but not limited to the College Council/Strategic Planning Steering Committee, Office of Distance Learning, Distance Education Committee, Academic Senate, Curriculum Committee and CTA.

D. Evidence that the institution has analyzed and provided for adequate human, administrative, financial and physical resources and processes necessary to initiate, maintain, and monitor the change and to assure that the activities undertaken are accomplished with acceptable quality, including:

1. Adequate and accessible student support services; enumerate services as detailed as possible; provide electronic links where available

As noted in section B.2 earlier in this report, the College has ensured that adequate support services are offered to students enrolled in correspondence courses. These include community students enrolled at the main campus in Blythe, students enrolled at the Needles Center and incarcerated students housed in participating prisons.

[17] CTA-District Agreement, 2009-10, Article IV, Section 15 Distance Education. Intellectual property rights and class size were negotiated in 2002 (Supporting Documents, L)

[18] Course outline-of-record, December 2010 (Supporting Document J)

Here are specific services to students enrolled in correspondence courses through the College:

a. *Community students:* Counseling services for correspondence education students are provided by the Blythe main campus counseling staff face-to-face (one-on-one and in a group), and well as via email and telephone. Financial aid advising is provided face-to-face as well as via email and telephone by the Blythe main campus counseling staff. Tutoring is available through the Learning Skills Center.

b. *Needles Center:* Counseling and financial aid services are available via webcam and telephone conferences with counselors located at the Blythe main campus. Tutoring is provided face-to-face by appointment and drop in on specified days.

c. *Incarcerated students:* Academic counseling services are provided to incarcerated students at the two local prisons by EOPS staff and the Office of Distance Learning. Financial aid advising for incarcerated students at the two local prisons is conducted by the Blythe main campus staff. Tutoring at the local prisons is provided on site at the prison by inmate-tutors. For prison locations outside the district, counseling is handled via telephone facilitated by the education department staff at the prison site. Applicable financial aid for outlying prison locations is handled by the distance learning staff. Tutoring at outlying prison areas is provided on site at the prison by inmate tutors.

The College's current financial problems, described elsewhere in this report, are not expected to have an impact on the quality or level of support services provided to students, incarcerated or community, enrolled in correspondence education. In fact, the College remains committed to the full utilization of resources available to provide needed support to students enrolled in all its programs.

This is possible as a result of the increasing use of technology in recent years with which to administer student support. Such technologies include:

i. Online registration has reduced considerably the need, in many cases, for face-to-face meetings between community students and counselors, including correspondence education students.

ii. Counseling and financial aid services are available to Blythe campus and Needles Center students via webcam and telephone conferences with counselors located at the main campus, enabling more efficient use of counselors' time and resources.

iii. For prison locations outside the College district, counseling is handled via telephone facilitated by the education department staff at the prison sites, eliminating the need for time-consuming and costly travel.

For incarcerated students at the two local prisons within the district, academic counseling services will continue to be provided by EOPS staff and Office of Distance Learning. Financial aid advising for incarcerated students at the two local prisons is conducted by the Blythe main campus staff.

Tutoring for correspondence at the Blythe main campus is available in the same manner it is available to face-to-face students, principally through the Learning Skills Center, which employs student tutors and one adjunct tutor. At the local prisons, tutoring is provided on site at the prison by inmate-tutors. Tutoring at outlying prison areas is provided on site at the prison by inmate tutors. For Needles Center students, tutoring is provided face-to-face by appointment and drop-in on specified days.

In summary, support services for correspondence education students are sufficient to meet students' needs. This is made possible through the development of efficient technologies that support the College's commitment to provide needed services to all students enrolled in its programs.

2. Sufficient and qualified faculty, management, and support staffing

In December 2011, several significant management changes occurred that had an impact on the administration of the Office of Distance Learning.

The Superintendent/President and the Dean of Distance Learning announced their retirements effective December 30, 2011. Additionally, as a result of a severe budget crisis affecting the entire College, the administration and Board of Trustees decided not to fill permanently any vacant management and administrative positions until a permanent Superintendent/President was appointed.

Furthermore, the administration and Board of Trustees decided that any vacant management or administrative position "which is filled on a temporary basis will be an 'acting' position [and] that whenever possible...will be at a lower level on the salary schedule..."[19]

As a result of these actions, the head of the Office of Distance Learning was reclassified as Interim Coordinator and has since been filled by an employee who previously served for several years as an academic guidance counselor in the Office of Distance Learning. The Interim Coordinator works under the direction of the Vice President of Instructional Services, assists the Office of Instructional Services

[19] Memorandum to PVC Faculty, Staff and Administration from Dr. James Hottois, Superintendent/President, October 14, 2011 (Supporting Documents, M)

in planning correspondence course offerings, ensures there are sufficient adjunct faculty to teach correspondence (and other) course sections, manages the budget and provides counseling support services to incarcerated students.[20]

In addition to the Interim Coordinator, the Office of Distance Learning has a staff capable of handling adequately the responsibilities assigned to the office. Please see the organization chart in Supporting Documents.[21]

Qualifications of faculty to provide correspondence education is described in Section F.1.m (ER 13—Faculty), later in this proposal.

3. Professional development for faculty and staff to effect the change

   As noted previously, numerous Flex Day programs have been devoted, at least in part, to addressing faculty training needs in correspondence course delivery (see section C.2.c above).

4. Appropriate equipment and facilities, including adequate control over any off-campus site

   Adequate systems are in place to ensure effective delivery of correspondence education and support. These systems include expeditious delivery of course materials to incarcerated students, delivery of course materials to community students through the Office of Distance Learning, tutoring support services both for community and incarcerated students and proctoring support for incarcerated and community students.

5. Sustainable fiscal resources including the initial and long-term amount and sources of funding for the proposed change and an analysis of fiscal impact on the institution's budget

   Correspondence education generates income through the production of FTES, sustaining itself and having a significantly positive impact on the overall College budget.

6. A comparative analysis of the budget, enrollment and resources; identify new or reallocated funds

   Here is a 5-year budget summary of correspondence education:

[20] Coordinator—Distance Learning job description, approved by the Board of Trustees, December 13, 2011 (Supporting Documents, N)

[21] Organization Chart, Office of Distance Learning, February 2012 (Supporting Documents, O)

Item	2007-08	2008-09	2009-10	2010-11	2011-12
Salaries	144,563	161,055	199,549	271,795	220,740
Benefits	27,849	64,074	91,028	110,916	84,075
Supplies & Materials	26,550	15,629	9,084	11,201	6,500
Other Operating Expenses/ Contract Services	155,100	118,824	71,131	106,899	60,300
Capital Outlay	2,500	500	0	0	0
Total	356,562	360,082	370,792	500,811	371,615

It is estimated that about 35% of the FTES, or about 600 FTES, produced by the College is attributable to correspondence class sections. The table shown in the following section, D.8, shows the significant student enrollment in correspondence sections compared to face-to-face sections.

Despite the budget problems currently facing the College, the correspondence education program is expected to continue to produce substantial FTES and to provide the College with a reliable source of financial stability.

7. A plan for monitoring achievement of the desired outcomes of the proposed change

The desired outcomes of correspondence education are to provide instructional services to incarcerated students who otherwise would not have access to such services, to provide community students with opportunities in addition to traditional face-to-face courses, to provide faculty with training to improve their teaching skills and to provide the counseling and administrative support to deliver these outcomes.

Monitoring desired outcomes is handled in various ways, including the program review process, deliberations of the Distance Education Committee, and reports by the Interim Coordinator of Distance Learning to the College Council/Strategic Planning Steering Committee and to the Administrative Council. Discussions about correspondence courses and programs frequently take place in the Academic Senate and Curriculum Committee; recommendations from these organizations are relayed directly to the Interim Coordinator of Distance Learning.

8. Evaluation and assessment of student success, retention and completion

Evaluations of student success, retention and completion are handled for correspondence courses in the same way they are handled for traditional face-to-face courses and programs, namely, by the institutional researcher for reports as required. Such reports would include program reviews, ARCC annual reports, and special studies.

The following chart shows a comparison of success rates comparing face-to-face sections vs. correspondence sections for Fall Semester 2008 through Spring Semester 2011, or three years[22]:

	FALL 2008						SPRING 2009				
	FF #	FF %		COR #	COR %		FF #	FF %		COR #	COR %
A,B,C,P	1,633	66.5%		1,828	62.2%		1,408	63.5%		1,880	62.8%
A,B,C...W	2,457			2,939			2,218			2,996	

	FALL 2009						SPRING 2010				
	FF #	FF %		COR #	COR %		FF #	FF %		COR #	COR %
A,B,C,P	1,648	66.1%		1,869	63.6%		1,284	67.7%		1,776	59.5%
A,B,C...W	2,495			2,939			1,896			2,984	

	FALL 2010						SPRING 2011				
	FF #	FF %		COR #	COR %		FF #	FF %		COR #	COR %
A,B,C,P	1,499	71.1%		1,849	57.2%		1,260	64.6%		1,737	58.2%
A,B,C...W	2,108			3,232			1,949			2,986	

E. Evidence that the institution has received all necessary internal or external approvals, including:

1. <u>A clear statement of what faculty, administrative, governing board, or regulatory agency approvals are needed, and evidence that they have been obtained</u>

   a. *Faculty*—Approval by the Curriculum Committee of the revised course outline-of-record template, which incorporates elements of face-to-face, correspondence and distance learning (online and ITV) for each new and updated course offered by the College, December 2010

   b. *Board of Trustees*—Approval of position of Assistant Dean of Distance Education Programs, 2001. Acceptance of the Distance Education Program Review Report May 2008. Ratification of Board of Trustees Policies and Administrative Procedures relative to correspondence programs, 2008 and 2010.

[22] Success is defined as earning a grade of A, B, C or P. Success rate is calculated as follows: A,B,C,P divided by A,B,C,D,F,I,NP,P,W. The numbers represent duplicated count, meaning the grades from all of the classes each student was enrolled in are counted for each semester. Noncredit classes and classes offered through instructional services agreements (fire science) are excluded.

c. *Regulatory Agencies*—The College is in compliance with all rules, regulations, policies, and laws governing the operation of a California community college. Compliance includes maintaining good standing with the requirements, standards and policies established by the ACCJC. Apart from the submission of the current proposal for substantive change, there is no regulatory agency approval required uniquely for correspondence education programs.

2. Legal requirements have been met

As stated in the previous section, the College is in compliance with all rules, regulations, policies, and laws governing the operation of a California community college.

Legal requirements relevant to the distance learning program would be compliance with all terms and conditions of the Memorandum of Understanding between Palo Verde College and the California Department of Corrections and Rehabilitation.[23]

3. Governing board action to approve the change and any budget detail supporting the change

Evidence of Board of Trustees' approval of the distance learning program is described in the introduction to this proposal. Board of Trustees' actions that are evidence of approval of correspondence education include: approval of the new position of Assistant Dean of Distance Education[24]; subsequent hiring of the candidate to fill the position; acceptance of the Distance Education Program Review report; and approval of various Policies and Administrative Procedures governing distance education and correspondence education programs.

F. Evidence that each Eligibility Requirement will still be fulfilled specifically related to the change

1. Requirements that are particularly impacted by the change should be addressed in detail

The following is an analysis of the potential impact of the distance learning program on each Eligibility Requirement:

a. ER 1 Authority—Palo Verde College District is regulated by the California Community College Board of Governors and is fully accredited by the Accrediting Commission for Community and Junior Colleges, Western

[23] Agreement Between Palo Verde College and the California Department of Corrections and Rehabilitation (Supporting Documents, P)

[24] Assistant Dean of Distance Learning was the original title of the position. It was later changed to Dean of Distance Learning, and, following the Dean's retirement, was changed to its current name, Interim Coordinator.

Association of Schools and Colleges. All courses, programs and degrees, regardless of the methodology of delivery, including correspondence education, are developed and evaluated in the same manner using comparable academic standards of quality and are subject to faculty review and approval.

b. ER 2 Mission—The College's mission statement is as follows:

"Palo Verde College is a California community college that provides an exemplary learning environment with high quality educational programs and services. It promotes student success, lifelong learning and community development. Our goal is to create better futures for our students and our communities."

As pointed out in section A.2 earlier in this proposal, the College's correspondence courses, like their face-to-face counterparts, offer students exemplary learning environments in which they can work to create better futures for themselves. For incarcerated students, the correspondence program is the only way they can acquire a college education and improve their lives once they are released. For community students, the variety of distance learning methodologies provides options to integrate their college work with the demands of jobs and family.

c. ER 3 Governing Board—The Board of Trustees is an independent policy-making body reflecting public interest in board activities and decisions. The Board of Trustees provides the final approval of all curricula produced by the faculty, including courses and programs offered in face-to-face and correspondence methodologies. The Board of Trustees has a long history of support, approval and endorsement of correspondence education programs. The Board of Trustees approved, in 2008 and 2010, policies and administrative procedures governing distance learning programs, as described in section G.1.j later in this report.

d. ER 4 Chief Executive Officer—The Superintendent/President is appointed by the Board of Trustees and is their sole employee. The Interim Coordinator of Distance Learning reports to the Vice-President of Instructional Services, who, in turn, reports to the Superintendent/President. The Superintendent/President does not serve as the chair of the Board of Trustees. The Superintendent chairs monthly meetings of the Administrative Council, a body composed of the Vice-Presidents and all management employees, including the Interim Coordinator of Distance Learning.

e. ER 5 Administrative Capacity—There is sufficient administrative capacity to manage the program, with a Interim Coordinator supervising a support staff of clerical personnel. The Interim Coordinator reports to the Vice President of Instructional Services who, in turn, reports to the Superintendent/President.

The current organization chart of the Office of Distance Learning is in Supporting Documents, O.

f. ER 6—Operational Status—Students of Palo Verde College are actively pursuing certificates and degrees, as shown under section ER 7—Degrees, below. The College does not collect data on the number of students earning degrees strictly by taking courses via distance learning. However, it is understood that the majority of students earning certain degrees and certificates are inmates, whose sole access to such programs is through correspondence education courses. Moreover, degrees and certificates fifty-percent of whose course requirements may be satisfied through correspondence education are listed in the introduction to this proposal, page 6.

g. ER 7 Degrees—Students are able to earn associate degrees and certain certificates by taking courses solely in distance learning methodologies, though all courses and programs are available through face-to-face learning as well. The availability of courses in distance learning enables incarcerated students to complete two-year degrees and certificates. Community students typically enroll in a combination of face-to-face and distance learning sections as they pursue their academic objectives. See page 6 for a listing of programs fifty-percent of whose course requirements may be satisfied through correspondence education.

The following chart shows degree and certificate awards during the past three years:

AWARD TYPE	PROGRAM TYPE	AWARDS		
		2009	2010	2011
Associate of Arts degree	Interdisciplinary Studies	59	83	79
Associate of Science degree	Business and Management	35	29	13
Associate of Science degree	Family and Consumer Sciences	1	3	2
Associate of Science degree	Engineering-Industrial Technologies			1
Associate of Science degree	Information Technology		1	1
Associate of Science degree	Interdisciplinary Studies	59	29	17
Certificate 18 to < 30 units	Public and Protective Services	10	8	1
Certificate 18 to < 30 units	Business and Management		1	
Certificate 18 to < 30 units	Engineering-Industrial Technologies		3	15
Certificate 18 to < 30 units	Family and Consumer Sciences		3	1
Certificate 30 to < 60 units	Business and Management	3	14	7
Certificate 30 to < 60 units	Engineering-Industrial Technologies	14	23	16
Certificate 30 to < 60 units	Family and Consumer Sciences	2		
Certificate 30 to < 60 units	Public and Protective Services		1	4
Certificate 30 to < 60 units	Health	20	12	14
Certificate 6 to < 18 units	Business and Management	21	58	51

Certificate 6 to < 18 units	Engineering-Industrial Technologies	2	4	
Certificate 6 to < 18 units	Family and Consumer Sciences	16	27	56
Certificate 6 to < 18 units	Information Technology	2	5	13
Certificate 6 to < 18 units	Media and Communications	5	11	15
Certificate 6 to < 18 units	Public and Protective Services	48	46	67
Other Credit Award < 6 units	Health	29	14	82

Although not all program awards are systematically tracked as to the number of incarcerated students vs. community students receiving such awards, the majority of students receiving associate degrees and certificates in business and management areas tend to be incarcerated students. The presumed reason for this fact is that most (but not all) incarcerated students are seeking practical business skills they can utilize upon their release from prison. Some incarcerated students seek transfer degrees, but most do not.

h. ER 8 Educational Programs—Courses offered in correspondence education are of comparable quality and rigor to courses offered in traditional face-to-face sections. Course outlines-of-record are evaluated and approved by the Curriculum Committee in face-to-face, correspondence and distance education methodologies, applying the same academic standards to each.

i. ER 9 Academic Credit—The College's semester units of credit for courses offered using face-to-face and correspondence methodologies are comparable as to academic rigor, subject matter, and scope and are taught by faculty members possessing at least the minimum qualifications for the appropriate discipline, as established by the California Community Colleges Chancellor's Office.

j. ER 10 Student Learning and Achievement—The expectations of student learning as evidenced by the attainment of student learning outcomes are as rigorous for correspondence sections as they are for face-to-face sections, evidenced by the program review process and by the recently-revised course outline-of-record template.[25] The College is currently working on the learning outcomes for its programs and degrees and will publish them in the College Catalog when ready.

k. ER 11 General Education—General education course are delivered in both face-to-face and correspondence methodologies and are of comparable quality and academic rigor. The quality and rigor of all courses is evaluated periodically by the Curriculum Committee in course outline-of-record updates and revisions, and

[25] The program review template for instructional, as well as non-instructional programs includes several questions pertaining to student learning outcomes; such questions apply to face-to-face, correspondence and distance education programs and courses. The course outline-of-record incorporates face-to-face, correspondence and distance education delivery methodologies in a single document, ensuring comparability as to quality and rigor among the course sections taught in those methodologies (Supporting Documents, J and Q)

by program reviews and updates conducted by each of the academic and vocational divisions.

l. ER 12 Academic Freedom—Board Policies and Administrative Procedures affecting academic freedom are in place and apply to all faculty and students, regardless of the courses and programs they are pursuing and regardless of the methodologies by which such courses and programs are delivered.[26]

m. ER 13 Faculty—There is a sufficient core of qualified faculty with full-time responsibility to the institution. Full-time and part-time faculty meet at least minimum qualifications for their disciplines, as determined by the Human Resources manager, Vice-President of Instructional Services, designated screening and hiring committees, and, when needed, by the Equivalency Committee. All faculty members are subject to these qualifications whether they teach correspondence or face-to-face sections. The Interim Coordinator assists the Vice-President of Instructional Services in evaluating adjunct faculty teaching correspondence and distance education classes. Full-time faculty is responsible for curriculum development, review, evaluation, revision and the update of courses and programs in their academic areas.

n. ER 14 Student Services—Student support services, including academic counseling, financial aid counseling and tutoring are made available to all students at the College, regardless of their location or the means of delivery of courses, which includes face-to-face and correspondence education. See responses to items B.2 and D.1 earlier in this proposal.

o. ER 15 Admissions—Admissions policies and procedures are published in the College Catalog, Student Handbook and Matriculation Plan, and are reviewed when appropriate at meetings of the Matriculation Committee, Distance Education Committee, Academic Senate and Curriculum Committee, College Council/Strategic Planning Steering Committee and in program review. The policies and procedures are the same for all students regardless of the program they are pursuing, and regardless of the methodologies of course and program delivery, that is, face-to-face, correspondence and distance learning, or any combination of these.

p. ER 16 Information and Learning Resources—Students enrolled in correspondence programs have access to instructional support services comparable to that of students enrolled in face-to-face sections. Assessment and placement services, as well as tutoring, are available to community students through the Learning Skills Center. The Library provides resources for academic research and other information through its online databases; these services are available to any student enrolled at the College, except incarcerated students who are prohibited by prison rules from using the internet. For incarcerated students,

[26] BP 4030 Academic Freedom, AP 4030 Academic Freedom: Professors, AP 4030-1 Academic Freedom: Students (Supporting Documents, R)

research and information resource are made available through special arrangements between the Library and faculty members. Tutoring for incarcerated students is provided on site at the prison by inmate-tutors. Tutoring for Needles students is provided face-to-face by appointment and drop in on specified days.

q. ER 17 Financial Resources—The correspondence program has more than sufficient financial resources with which to operate effectively. In fact, correspondence sections, in particular, have produced substantial apportionment as shown in the response to item D.5.

r. ER 18 Financial Accountability—Correspondence education maintains an operating budget that is reviewed annually by the Budget Committee (see budget discussion in section D.1.5 and 6 later in this report).

s. ER 19 Institutional Planning and Evaluation—Correspondence education is reviewed regularly by various College committees and organizations with interest in the effectiveness of the program. These committees include the Distance Education Committee, College Council/Strategic Planning Steering Committee, and Student Learning Outcomes Committee, as well as individual faculty members and academic divisions. Recommendations for changes and improvements to correspondence education are usually made directly to the Interim Coordinator of Distance Learning, who is highly responsive to such recommendations. Student learning outcomes are addressed and evaluated for correspondence course sections in the same manner they are addressed and evaluated, primarily through individual faculty member assessments, division-level program reviews, and Curriculum Committee reviews of course outlines-of-record.

t. ER 20 Public Information—Correspondence education is well-advertised to the public. Courses presented in correspondence education are clearly identified as such in the College Catalog, and in PVC Services, on the College's website. Polices and information dealing with admissions, fees, conferral of awards, academic regulations, grievance and complaint procedures, sexual harassment, and refunds are all addressed in the College Catalog and pertain equally to correspondence and face-to-face programs and courses.

u. ER 21 Relations with the Accrediting Commission—The College strives to achieve accreditation standards and complies with ACCJC requests, directives and decisions and policies. The College makes complete, accurate and honest disclosure, as evidenced by the College's long history of cooperation with the ACCJC, on all matters including correspondence education.

G. Evidence that each Accreditation Standard will still be fulfilled specifically related to the change and that all relevant Commission policies are addressed

1. Standards that are particularly impacted by the change should be addressed in detail. There should be a description of the process for monitoring and evaluating the effectiveness and learning outcomes expected through the proposed change.
   a. Standard I.A Mission

      As explained in section A.2 earlier in this proposal, the College's correspondence courses, like their face-to-face counterparts, offer students exemplary learning environments in which they can work to create better futures for themselves. For incarcerated students, the correspondence program is the only way they can acquire a college education and improve their lives once they are released. For community students, correspondence education provides options to integrate their college work with the demands of jobs and family.

      Correspondence programs are thoroughly aligned with traditional face-to-face programs through division and Curriculum Committee review; correspondence education reflects one of the key goals of the mission statement, namely, to "create better futures for our students." (Standards A.1, A.2) The mission statement, along with the College's Strategic Plan, has been reviewed five times by the College's constituent groups since 2001 and was changed only slightly during those reviews. The College has felt that the mission statement adequately represents the College's broad educational purposes, of which correspondence education is an important component.

   b. Standard I.B Improving Institutional Effectiveness

      Correspondence education is managed by the Interim Coordinator of Distance Learning and staff, under the general direction of the Vice President of Instructional Services. The key responsibilities of the Interim Coordinator are to plan class schedules each semester in cooperation with the Office of Instructional Services, ensure there are sufficient part-time adjunct faculty when needed, work with officials at the prisons where the College offers courses, provide counseling support to incarcerated students and participate in various committees and organizations to provide the opportunity for planning, evaluation and dialogue.

      Advice from the other administrators, faculty, staff and students on managing the correspondence program is routed to the Office of Distance Learning through various avenues and help promote dialogue among the College's constituencies. These avenues include the Distance Education Committee and the College Council/Strategic Planning Steering Committee. Correspondence education is also part of program review every five years, a focused, program-level self-study reviewed and commented on by the Program Review Committee, Budget Committee, College Council/Strategic Planning Steering Committee, and the Board of Trustees. These processes help provide for dialogue with College constituencies on correspondence education, help set goals to improve correspondence education program effectiveness, provide for a systematic cycle of evaluation and improvement, allow for broad-based planning, offer

documented results, provide for review of planning and modification when needed, and provide for interaction with other instructional programs, student support services, Library and Learning Skills Center services (Standards I.B. 1, 2, 3, 4, 5, 6, and 7).

c. Standard II.A Instructional Programs

The central theme of Standard II that is applicable to the correspondence education program is that all courses and programs, regardless of the method of delivery and location where delivered, are consistent with the mission of the College, meet the same standards of quality as face-to-face course sections, address student needs, are evaluated for quality, effectiveness and student learning outcomes, and are developed and evaluated principally by faculty.

That correspondence education is consistent with the College mission is addressed in section A.2 earlier in this proposal (Standard II.A.1). The quality of correspondence courses is maintained in very much the same way face-to-face courses are evaluated, namely, through periodic, division-level program review, assessment of courses by the Curriculum Committee, the inclusion of face-to-face and correspondence methodologies in each course outline-of record for each course, and the periodic review and updating of every course offered by the College (Standards II.A.2; II.A.2.e).

Correspondence education meets important student needs, namely, to provide courses to students, namely, prison inmates, who otherwise would be unable to pursue a higher education, and to community students who require alternative ways to take courses to accommodate the demands of jobs and family and to accommodate diverse learning styles(Standards II.A.1.a, b; II.A.2.d).

Correspondence education courses, like their face-to-face counterparts, are evaluated and improved upon systematically in terms of quality, effectiveness and assessment of student learning outcomes through various means: periodic division-level updates of all courses; program review, performance evaluations of all full-time and part-time faculty, and review and approval of course outlines-of-record by the Curriculum Committee (Standards II.A.1.c; II.A.2.b,e,f).

All courses, regardless of mode of delivery, are approved by full-time faculty: courses are reviewed and approved by the appropriate academic division, are evaluated and approved by the Curriculum Committee (consisting of faculty representatives of each division) and are updated and revised periodically by faculty of each division (Standards II.A.2.a, b)

d. Standard II B Student Support Services

The key student support issues relevant to correspondence education are ensuring that students have sufficient access to and support from the student services

provided by the College, and that such access and support is comparable to that provided to students enrolled in traditional face-to-face courses. That such services are periodically evaluated and improved upon is also a relevant issue for correspondence programs.

As noted earlier in sections B.2, the College responded satisfactorily to a recommendation made by the 2002 visiting accreditation team having to do with the sufficiency of support services to students enrolled in correspondence courses. As requested by the ACCJC, the College responded to this recommendation in the Focused Midterm Accreditation Report in 2005, citing improvements made by the College to provide academic advising support to students at the Needles Center, incarcerated students, and community students enrolled in correspondence courses.

Furthermore, specific student support services, namely, academic counseling, financial aid counseling and tutoring are made available to students enrolled in correspondence sections, and such support is comparable to the support afforded students enrolled in traditional face-to-face class sections. These points are detailed in section D.1 earlier in this proposal (Standards II.B.1; II.B.3.a)

The evaluation of student support services generally, and specifically, their effectiveness for students in correspondence courses, takes various forms: regular meetings of the Matriculation Committee, Distance Education Committee, Academic Senate, and College Council/Strategic Planning Steering Committee; production of program review for student support services every five years; the periodic performance evaluation of counselors and advisors in terms of their ability to address problems affecting correspondence students; and the categorical program assessment reports, which include EOPS, DSPS, CalWORKS and financial aid (Standards II.B.4).

e. Standard II.C Library and Learning Support Services

The issues most significant for the library and learning support services, relative to this proposal, are accessibility for correspondence students, the extent to which the needs of correspondence students are met, and the periodic evaluation of the effectiveness of these support services.

The two resources available at the College relevant to this standard are the Library and the Learning Skills Center. The Library provides support in terms of research, encouraging information competency, and providing a safe and comfortable learning environment. The Learning Skills Center administers assessment tests, conducts supplemental skills courses, provides work stations for study, and provides face-to-face tutoring. All these services are available to students in correspondence education courses.

Here, specifically, is how the Library and Learning Skills Center address key needs of distance learning students:

Library—Access to library research resources is available to all students, except incarcerated students, via computer to the EBSCO databases. For incarcerated students, a librarian is available to assist in the research requests consistent with the curriculum of the course in which the student is enrolled (Standards II.C.1.c, e; II.C.2).

Library services are systematically evaluated every five years in program review. The librarian, a full-time faculty member, participates in various College committees, including the Academic Senate, Curriculum Committee, and Student Learning Outcome Committee, and regularly attends certain division meetings, such as the Communications Division, to stay current on students' and faculty members' evolving needs and on ways to improve services (Standards II.C.1.e, II.C.2).

Learning Skills Center—Access to assessment and tutoring services at the Learning Skills Center is available to all students, including community students enrolled in correspondence classes. Tutoring at the Needles Center is provided face-to-face by appointment and drop in on specified days. Tutoring for incarcerated students is provided by inmate-tutors at the prison site (Standards II.C.1.c, e; II.C.2).

Assessment and placement of students enrolled in correspondence sections is handled online at the Learning Skills Center facility. Assessment and placement of incarcerated students is administered at the prison site by proctors, and the results are sent via courier to the Learning Skills Center for review and placement. For Needles Center students, assessment and placement is administered online in the same way it is handled for students at the Blythe main campus (Standards II.C.1.c, e; II.C.2).

The Learning Skills Center is systematically evaluated in program review every five years (Standards II.C.1.e; II.C.2).

The recent retirement of the Learning Skills Center coordinator has resulted in changes in the staff persons handling the various duties of the Learning Skills Center; however, the procedures and practices of the Learning Skills Center, as well as the quality of those services, remain unchanged.

f. Standard III.A Human Resources

Human resources accreditation standards that are most relevant to the correspondence program are that the hiring and selection of faculty teaching correspondence courses includes evaluation of experience and training in correspondence courses, that performance evaluations take into account

effectiveness in teaching correspondence, that the College has sufficient faculty and administrative support for the correspondence program, and that the College provides adequate training and development opportunities to faculty in teaching in correspondence education.

There have been only a few new positions in the past few years, but they contain references to background and experience in correspondence education. For example, the position of English Instructor contains the statement: "The instructor will teach writing and literature courses using a variety of teaching methodologies. Such methodologies include traditional lecture-discussions, writing lab, correspondence, online, interactive TV and hybrid."[27]

The interviewing committee may, at its discretion, ask a candidate specific questions about his or her background in correspondence teaching, and will evaluate the response along with other factors in the final hiring decision (Standard III.A.1).

In faculty performance evaluations, students enrolled in distance learning course sections are given the opportunity to evaluate their instructors in various areas, including the instructor's effectiveness in teaching correspondence education (Standard III.A.1.b).[28]

As noted in previous sections, correspondence education is managed by a fully-staffed Office of Distance Learning, headed by an Interim Coordinator, whose responsibilities include, under the direction of the Vice President of Instructional Services, the planning of course schedules, hiring of qualified adjunct faculty, and the assignment of full-time faculty to course sections. (Standard III.A.2).

Moreover, as noted in previous sections, there is a sufficient core of qualified faculty with full-time responsibility to the institution. Full-time and part-time faculty meet at least minimum qualifications for their disciplines, as determined by the Human Resources manager, Vice-President of Instructional Services, designated screening and hiring committees, and, when needed, by the Equivalency Committee. Full-time faculty is responsible for curriculum development, review, evaluation, revision and update of courses and programs in their academic area for face-to-face and correspondence sections (Standard III.A.2).

The College provides faculty sufficient training and development opportunities in correspondence education teaching. Moreover, several Flex Day programs have been devoted, at least in part, to addressing faculty training needs in correspondence learning courses (Standard III.A.5.a).

---

[27] Job description, sample: English Instructor (Supporting Documents, S)

[28] Student Evaluation of Faculty Member, Distance Education, from Faculty Evaluation Procedure, CTA-District Agreement, 2007 (Supporting Documents, T)

g. Standard III.B Physical Resources

The physical resources relevant to correspondence education are principally the Office of Distance Learning, which provides a central location for the collection and distribution of assignments and student work. The office also maintains proctored areas for students to take exams. Incarcerated students, likewise, have areas (and staffing) designated for proctoring. Incarcerated students have access to prison personnel designated to collect and distribute assignments and students' work and to arrange for work to be sent via courier to the instructor (Standard III.B.1, 2).

h. Standard III.C Technology Resources

The correspondence education program requires virtually no technology, particularly for incarcerated students, who are not permitted to use the internet, voice mail or email. For these students, syllabi and assignments are provided in paper form, and work is transmitted between students and instructor by courier. The same is generally true for community students, that is, students who are enrolled in correspondence courses but who are not incarcerated. Course materials are provided to the Office of Distance Learning for distribution to students, and they are also posted to the College's Bridge, an online learning management system that supplements manual transmission of correspondence materials. Community students also provide work to instructors via email. These technologies are well-maintained and faculty members are trained in their use (III.C.1).

i. Standard III.D Financial Resources

The accreditation standards most relevant to the correspondence education are those pertaining to long-range planning, financial control and audit and contractual agreements.

Correspondence education is fully integrated with the long-range financial and program planning process of the College, with the presence of the Interim Coordinator of Distance Learning on the College Council/Strategic Planning Steering Committee, the elevation of the Distance Education Committee (initially an Academic Senate committee) to a mutual agreement committee broadening committee membership to include all College constituencies, and the production of a program review report, in 2008, by the Office of Distance Learning (Standard III.D.1.c).

The financial resources of correspondence education are managed by the Interim Coordinator of Distance Learning under the direction of the Vice President of Instructional Services. Financial transactions of all College departments,

including the Office of Distance Learning, are centralized in the Office of Administrative Services and are subject to independent audit annually (Standard III.D.2.a).

Adjunct instructors teaching correspondence education sections are employed under contractual agreements with the College (Standard III.D.2.f).

As for the financial sustainability of correspondence education, it is clear that correspondence is an immensely attractive alternative for students—community students as well as incarcerated students. This is evidenced by the enrollments shown in the table in section D.8 earlier in this proposal (page 17), and by the comparable success rates between face-to-face and correspondence students, shown in the same table. It is estimated that at least 35% of the FTES produced by the College is attributed to correspondence education, a substantial portion of the College's apportionment.

The College recognizes that there is risk in relying on the incarcerated student population for FTES. To help ensure financial sustainability of correspondence education, the College is addressing that risk in several ways:

i. Maintaining and encouraging strong student support services among incarcerated students in academic counseling and tutoring, comparable to the student support services available to community students

ii. Maintaining cooperative and constructive relationships between the College and prison officials and contacts, principally through the efforts of the Interim Coordinator and staff

iii. Strengthening the efficiency of the correspondence education program among community students through the use of technology, such as the Bridge, an online course management system that is effective for all modes of delivery—correspondence (for community students only), online and ITV

j. Standard IV.A Decision-Making Roles and Processes
Standard IV.B Board and Administrative Organization

The accreditation standards most relevant to correspondence education are those pertaining to the policy-making role of the Board of Trustees. The adoption by the Board of Trustees of policies and administrative procedures governing correspondence education demonstrate that the College's administrative

leadership and Board of Trustees are helping assure the quality, integrity and effectiveness of this program (Standards III.A.1, 2; III.B.1).[29]

k. ACCJC Policy on Distance Education and on Correspondence Education

The College's correspondence education program meets the requirements of the Policy on Distance Education and on Correspondence Education (hereinafter "ACCJC Policy"), as follows:

1. *Clarify terminologies:* The College's definition of "correspondence education" is consistent with the definition provided in the ACCJC Policy, as evidenced in the course outline-of-record template, revised December 2010, and in Board of Trustees' policies and administrative procedures dealing with correspondence education.

2. *Policy:* The College offers correspondence courses and programs that provide equivalent quality, accountability and focus on student outcomes as face-to-face courses and programs; correspondence courses and programs are designed to meet the emerging needs of students and society while maintaining quality; and correspondence courses and programs meet accreditation standards, as described earlier in this proposal, in sections F.1 and G.1.

3. *Policy Elements:*

   a. *Mission:* Correspondence education is consistent with the College's mission, as discussed earlier in Section A.2.

   b. *Control:* The College controls development, implementation, and evaluation of all courses and programs, including correspondence, through the full-time faculty, academic divisions, the Curriculum Committee and the program review process.

   c. *SLOs:* Student learning outcomes are required of all courses, including correspondence, as evidenced by course outlines-of-record.

   d. *Assessments:* Faculty members employ various assessment techniques to verify the attainment of stated student learning outcomes in their classes, including correspondence courses.

   e. *Substantive Change Requirements:* The College has referenced the correspondence education programs in two Self-Study reports, numerous follow-up reports, and several annual reports. The College

[29] Policies relating to distance learning include BP 4105 Distance Learning; AP 4105 Distance Education; AP 4105-1 Distance Education—Interactive Television (ITV) Courses; AP 4105-2 Correspondence Education (Supporting Documents, E)

was unaware until recently that it was required to submit a Substantive Change Proposal for this activity. Hopefully, this proposal will correct this error.

f. *50% or more of courses via distance education or correspondence education:* The College reported in the 2007 Annual Report that it provides correspondence education to inmates at several correctional facilities in California. The report stated that, at the time, only a few degrees and certificates could be offered, suggesting that more than 50% of a program's course requirements could be met by correspondence education. Unfortunately, the College was not aware that it had to submit a Substantive Change Proposal—an error which, hopefully, will be corrected in the present proposal.

g. *Student identity and confidentiality:*

   i. Verifying the identity of incarcerated students enrolled in correspondence courses is handled at the prison by a coordinator (a prison employee, not an inmate) who arranges to courier work to the College, and personally returns graded work to each inmate student. Exams at the prison are proctored. The identities of community students enrolled in correspondence courses are verified at the time of registration, and by the instructor who may require students to take exams in the Office of Distance Learning where they must show identification.

   ii. Faculty and staff take great care not to compromise the confidentiality of its students, regardless of the methodology of course delivery. For correspondence courses, work is returned to inmate students via courier; a prison official personally returns work to each student. For community students, faculty members return work to students through the Office of Distance Learning where it is retained until the student picks it up. The same process applies to students at the Needles Center, where staff retains graded work until the student picks it up.

2. <u>Depending on the nature of the proposed change, the Commission may ask for more detailed information to assist the staff and the Committee on Substantive Change in their review</u>

   The College is prepared to provide the Commission any additional information it may require in evaluating this proposal.

3. Failure to address Eligibility Requirements, Accreditation Standards and Commission policies could result in the proposal being considered incomplete or rejected

   The College believes it has adequately addressed the Eligibility Requirements, Accreditation Standards and Commission policies relevant to the correspondence education program. See sections F.1 and G.1 earlier in this proposal.

LIST OF SUPPORTING DOCUMENTS

The following documents are referenced in the text of this proposal and are included in their full or excerpted text, by letter, A through T, in the following pages

A. Evaluation Report March 2002 (visiting team)

B. Evaluation Report March 2008 (visiting team)

C. Letter to Susan Clifford, Vice-President, ACCJC, from Brian Thiebaux, ALO, Palo Verde College, June 28, 2011

D. Board of Trustees' Minutes: May 22, 2001 (New Position for Assistant Dean for Distance Education); July 24, 2001 (Employment of Assistant Dean of Education); May 13, 2008 (Acceptance of Program Reviews, including Distance Education); October 26, 2010 (Revised BP 4105 Distance Learning)

E. Board of Trustees' Policies and Administrative Procedures: BP 4105 Distance Learning; AP 4105 Distance Education; AP 4105-1 Distance Education—Interactive Television (ITV) Courses; AP 4105-2 Correspondence Education

F. 2006-07 Accreditation Annual Report

G. Program Review Report, Distance Education Program, May 2008

H. Focused Midterm Accreditation Report, March 15, 2005

I. Report of the Institutional Self-Study for Reaffirmation of Accreditation, March 2008

J. Course Outline-of-Record, Template, revised December 2010

K. Flex Day Agendas: August 20, 2007; January 14, 2008; August 20, 2008; March 18, 2009; February 11, 2011

L. CTA-District Contract, Section 15 Distance Education

M. Memorandum to PVC Faculty, Staff and Administration from Dr. James Hottois, Superintendent/President, October 14, 2011

N. Coordinator—Distance Learning job description, approved by the Board of Trustees, December 13, 2011

O. Organization Chart, Office of Distance Learning, February 2012

P. Agreement Between Palo Verde College and the California Department of Corrections and Rehabilitation

Q. Program Review Templates for Non-Instructional and Instructional Programs, revised October 19, 2010

R. Board of Trustees' Policies and Procedures, BP 4030 Academic Freedom; AP 4030-0 Academic Freedom: Professors; AP 4030-1 Academic Freedom: Professors

S. Job Description, sample: English Instructor

T. Student Evaluation of Faculty Member, Distance Education, from Faculty Evaluation Procedure, CTA-District Contract 2007