Announcement of Public Comment Period:

Role of Distance Education in the Preparation of Professional Homeopaths

PUBLIC COMMENT PERIOD CONCLUDED - December 2015

The Accreditation Commission for Homeopathic Education (ACHENA) is seeking comments from all segments of the homeopathic community and the public at large regarding the role of distance education in the preparation of professional homeopaths. The two overarching questions that ACHENA is seeking community input on are as follows:

1. Should ACHENA accreditation standards be revised such that schools offering distance learning only programs to train professional homeopaths would be eligible to achieve accreditation?
2. If ACHENA were to revise its standards to allow schools offering distance learning only to achieve accreditation, what additional guidance beyond ACHENA’s current standards regarding distance learning, should be included in the standards?

To submit a comment:
Please read all background information outlined below prior to submitting your comment. Comments should be sent electronically to ACHENA at the following email address:
publiccomment@achena.org

Community Discussion:
Date: Tuesday, October 6th at 7pm east coast time
Call-in information: 605-475-6150 access #142-2391
ACHENA will host a public discussion of this topic via teleconference. Schools and Individuals are invited to offer testimony for consideration and there will be time for discussion. If you would like to offer formal testimony on this topic please contact ACHENA at publiccomment@achena.org

The public comment period will be open for a period 45 days.
All comments must be received by ACHENA at the designated email address prior to midnight Pacific Time, November 7, 2015.
BACKGROUND

In 2012, ACHENA issued an updated Accreditation Manual which, for the first time, included specific reference to distance education. The standards outlined in the 2012 Accreditation Manual make eligible for accreditation schools that offer programs totaling at least 1,000 hours of combined classroom and clinical study. The standards allow for accreditation of in-person programs as well as blended learning programs (i.e. programs that offer distance education along with in-person education). The standards do not set a minimum number of in-person contact hours. Current standards allow schools to determine the number of in-person contact hours but schools must be able to demonstrate that the program includes: 1) adequate in-person contact hours to ensure that students receive sufficient clinical mentoring, and 2) the school must be able to demonstrate that it has sufficient in-person contact to be able to accurately assess student’s clinical skills prior to graduation. Guidance regarding clinical training requires that schools offer programs which support students in their progression from observing case taking, case analysis and case management to taking increasing levels of responsibility for case taking, case analysis and case management such that, by graduation, students can meet all clinical competencies required of a professional practitioner.

The 2012 Accreditation Manual includes the following standards and criteria to guide provision of homeopathic education via distance learning:

Excerpted from the 2012 Accreditation Manual which can be found at: http://achena.org/FormsAndDocuments.htm

NOTE: The language included in this text box comes from existing ACHENA standards related to distance education.

Criterion 7.5 -- Assessment Practices for Distance Learning Students

The program must have policies and procedures to verify the authenticity of distance learning student’s work on exams, papers and casework. Programs that meet this standard would likely employ methods such as-- a secure login and pass code; proctored examinations; and use of new or other technologies and practices that are effective in verifying student identity.

Guideline: Assessment practices for distance learning students must be of comparable intensity and comprehensiveness as assessment practices in place for on-campus students.

Guideline: Institutions and programs that employ distance learning must have a process for direct observation and assessment of the clinical skills of distance learning students.
**Criterion 8.6 -- Use of Distance Education**

ACHENA accredited institutions and programs that employ distance education technologies as part of their program of study should clearly delineate those areas in the course of study that are appropriate for delivery via distance education and clearly delineate the type of distance learning technology to be employed.

**Note:** Teaching clinics that use a camera in one room and have students observe in the next room via video feed or that employ a one way mirror are **not considered to be employing distance education**.

**Guideline:** Institutions and programs that employ distance learning technologies should take steps to ensure that the faculty is proficient in, and comfortable with, the use of the technology for teaching purposes.

**Guideline:** Institutions and programs that employ distance learning technologies should take steps to ensure that students are proficient in, and comfortable with, the use of the technology.

**Guideline:** Institutions and programs that employ distance learning technologies that are synchronous should establish policies and procedures to ensure meaningful participation by distant students in all classroom activities, including: opportunities to ask questions, participate in discussion and benefit from the full range of methods of teaching employed in the classroom.

**Guideline:** Institutions and programs employing distance learning technologies that are asynchronous should establish policies and procedures to ensure faculty monitor student progress, are accessible to respond to student questions and maintain regular contact with students via phone, email or online.

**Guideline:** Institutions and programs that employ distance learning technologies should gather feedback about the impact of the use of such technologies on campus-based students and the physical classroom environment.

**Guideline:** Use of distance learning technologies should not be employed sporadically solely for the convenience of students but should be used as part of an overall planned curriculum and course of study.

**Guideline:** Institutions and programs employing distance learning technologies should routinely evaluate student achievement and should compare levels of achievement attained through use of distance education with the level of achievement attained through traditional classroom instruction.
Guideline: Institutions and programs which employ distance learning technologies should develop systems to ensure that students attending via distance learning can notify the instructor immediately of any malfunction in the technology. There should be a process in place to periodically monitor that distance learning technologies are operating as intended without technical malfunction or interruption.

Guideline: Institutions and programs which employ distance learning technologies should engage in community building activities to promote a unified school community. All students, whether they are distance learning or campus based students, should have ample opportunities to build meaningful relationships with each other, faculty, administrators and student services staff.

Criterion 8.6 -- (a) Verifying student identity
Institutions and programs which employ distance education technologies as part of their program of study must have processes in place through which the institution establishes that the student who registers in a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit.

Guideline: The institution or program must have policies and procedures in place to verify the identity of a student who participates in class or coursework by using methods such as -- (i) A secure login and pass code; (ii) Proctored examinations; and use of new or other technologies and practices that are effective in verifying student identity

Guideline: The institution or program must make clear in writing its practices to protect student privacy and notify students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.

Criterion 8.6 -- (b) Inform AHCENA of significant increase in student enrollment
If inclusion of distance learning into the course of study results in an increase in student enrollment of greater than 50 percent, the institution or program must report this increase to ACHENA within 10 days of the increased level of student registration.

Criterion 8.6 -- (c) Inform students of additional fees for distance education
Institutions or programs employing distance learning technologies must inform students during the application process of any required equipment for participating in distance learning activities, for example, computer, speakers, microphone, internet access, etc. Any additional fees should also be explained as part of the application process and in all cases before student enrollment.
Criterion 8.7 -- Syllabi
A syllabus must be prepared for each course or major unit of instruction in the program and must be distributed to each student in the course and must be maintained in the program's curriculum files. A syllabus must contain at least the following: the purpose of the course; the objectives of the course in specific terms; the prerequisites of the course; an outline of the course and laboratory instruction in enough detail to permit the student's to see its full scope; the method(s) of instruction; the requirements of the course with the important dates (e.g., papers, projects, examinations); the type of grading system used; and the required and recommended reading.

Guideline: Syllabi should be made available to faculty members so that they may learn what the various courses in the curriculum include and can relate their instruction to other courses.

Guideline: Any adaptations to methods of instruction for distance education should be clearly delineated in the syllabi.

Criterion 14.1 -- Resources and access
The institution must have its own library or collection of learning resources, or must have executed long-term written contracts providing for usage of other specific library resources for the students if adequate and reasonable accessibility is ensured.

Guideline: Institutions and programs offering distance education must make reasonable efforts to ensure that distance learning students have access to materials available in the library. This should include opportunities for students to learn about the scope of library holdings and opportunities for them to access these holdings on-line, through homeopathic software programs or through borrowing hard copies of materials via the mail.

NOTE: The language included in this text box comes from existing ACHENA standards related to distance education.

The Evolution of Distance Learning Technologies and Considerations related to the Education of Professional Homeopaths
ACHENA recognizes that there have been significant new developments in distance learning technology since the 2012 Accreditation Manual was issued. The development of distance education only programs in many fields of study has expanded tremendously and national standards exist to guide distance education programs. The presence of synchronous distance learning technologies, when working properly, can create an environment very close to the experience of in-person education.
Given the relatively small number of schools which prepare homeopathic practitioners and the large geographic size of North America, without distance education, homeopathic schools are largely out of reach for many students. Access to distance learning programs may very well be critical to the continued growth of the profession.

Several schools which have offered blended learning programs in the past report that it is increasingly difficult to require students to attend in-person programs. Schools report that it is increasingly difficult to draw a sufficient number of students to make in-person contact hours fiscally viable and some schools fear that if accreditation forces them to offer in-person contact hours that it will have a negative impact on their ability to remain financially viable.

It must be noted that, while there has been great progress in distance learning technology, difficulty managing this technology is also common. The effectiveness of distance learning technology varies based on different platforms used, connectivity issues and student access, especially for students who may reside in rural areas or areas with limited signal strength. The use of distance learning requires students to have skills related to the use of technology and this does present an additional demand for some students. The addition of distance learning students to in-person classroom education can have a negative impact on those students who are participating in-person as frequent pauses to address technical difficulty can interrupt the learning environment.