

***Implications of WTO/GATS on
Quality Assurance of Distance Education
(including e-Learning) for Higher Education***

A paper prepared for

**UNESCO Regional Seminar on
the Implications of WTO/GATS on
Higher Education in Asia and the Pacific**

Seoul, The Republic of Korea

27-29 April 2005

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A Table of Contents

Abstract

Introduction

National QA Frameworks for DE

Within QA Framework for higher education

Separate QA framework for DE

QA Mechanisms in Mega Universities

QA organizations

QA areas and criteria

QA methods

QA for E-Learning

Growth of e-learning providers

QA for e-learning at national level

QA for e-learning at institutional level

Implications of GATS on QA in DE

To review and strengthen existing national QA framework

To promote cross-border QA activities

To promote capacity building

To protect DE learners

Conclusion

References

Abstract

Cross-border education is a reality today. And it is certain that information and communication technology will be used to a growing extent for cross-border education. Distance education including e-learning will develop alongside and as part of traditional cross-border education. In this context, there is an urgent need to review the existing quality assurance mechanisms of distance education for higher education at national and institutional level, discuss new challenges of a changing environment in an international context, and build a capacity for quality assurance to enhance the quality provision in a globalized higher education market. This paper discusses recent development of quality assurance systems in distance teaching universities and e-learning institutions at higher education level in the context of cross-border education, and draws certain implications of GATS on quality assurance in distance education for governments and DE providers.

Keywords: quality assurance, distance education, e-learning, cross-border education, GATS on educational services, mega university

Introduction

During the 1970s and 1980s, many countries and territories in the Asia-Pacific (AP) region established distance education (DE)¹ institutions at the higher education (HE) level to meet the educational needs of a variety of groups of people such as working adults, high school graduates, teachers, and housewives. For example, almost all the countries and territories in the region have at least a distance teaching university and some countries such as Australia, Canada and the USA offer DE programmes within on-campus universities. The Asian region, especially, has the largest number of adult learners attending distance teaching universities compared with other parts of the world and seven mega-universities (those with an enrollment of at least 100,000) across China, Indonesia, India, Korea, Iran, Turkey, and Thailand (Shive & Jegede, 2001).

Since the mid-1990s, many conventional distance education institutions have begun to introduce information and communication technology (ICT) mainly as supplementary modes of instruction. But some institutions have created e-learning programmes. Examples include the e-MBA programme of the Anadolu University in Turkey, the online Lifelong Education Graduate School at the Korea National Open University in Korea, the online MBA of the Athabasca University in Canada. Besides these e-learning graduate programmes, several distance teaching institutions have incorporated e-learning components in their existing programmes. Online tutoring and online discussion groups are popular among those e-learning components (Jung, 2004a).

In parallel with the development of distance education and the increased use of ICT, cross-border educational activities have grown. In the past ten years or so there has been a noticeable surge in the export and import of educational services around the world. DE is one of all manifestations of the current trend and has been steadily gaining ground. For example, universities in Australia, UK, USA, and Canada have

¹ Distance education is defined as a form of education whereby students may complete all or part of their course of study in a geographical location apart from the education provider or the teacher. DE includes three modes: a conventional mode of distance education in which printed materials, audio and video (or radio and TV), and/or face-to-face tutorials are used, an e-learning mode in which the Internet is used as a main delivery means of instruction and interaction, and a mixed mode which incorporates conventional media with the Internet.

more actively exported their DE programmes including e-learning to other parts of the region. China, Hong Kong (China), India, Malaysia and Singapore, in the Asia-Pacific region have been among major importers of those programmes. However, among those importers, Hong Kong (China), India and Malaysia have also exported their programmes to other countries such as Bangladesh, China, Indonesia and Sri Lanka. Overall, the development of e-learning has contributed to the growth of transnational education².

All these trends challenge the existing quality assurance (QA) frameworks of DE, which have given a more focus on widening access than on assuring quality, and often do not address for-profit and cross-border education. Especially in the context of growing globalization in distance education, there has been an urgent need for international initiatives to review quality assurance mechanisms of DE for higher education at national and institutional level, discuss new challenges of a changing DE environment, and build a capacity for QA to enhance the quality provision in a globalized higher education market.

This paper discusses recent development of QA systems in distance teaching universities and e-learning institutions at higher education level in the context of cross-border education, and analyzes implications of GATS on current and future development of QA mechanisms of distance education. Even though the term for quality assurance in DE vary across countries and DE institutions, in this report, QA is defined as planned activities carried out with the intent and purpose of maintaining and improving the quality of learning rather than simply evaluating activities.

National QA Frameworks for DE

Recent studies (Jung, 2004a; 2004b; Stella, 2004) show that whereas QA frameworks of traditional higher education are well established in most of the countries of the Asia-Pacific (AP) region, those of DE are at an early and therefore crucial stage of development. It is also observed in the studies that a quality culture has been emerging, if not fully integrated, in most distance teaching institutions investigated.

² Transnational education is education offered across countries through a variety of arrangement, including via distance education or e-learning.

1) Within QA Framework for higher education

In most of the countries around the world, DE including e-learning has been evaluated within QA frameworks of higher education based on the belief that DE and e-learning do not need to have separate QA standards and existing ones are flexible enough to adapt to new developments (Van Damme, 2002). Examples include:

- Australia: Australian Universities Quality Agency (AUQA), founded as an independent agency in 2000, promotes, audits and reports on QA in all Australian higher education. There is no national QA framework only for DE. Universities in Australia undertake QA activities for DE that satisfy the expectations of external quality review agencies including AUQA.
- China: Distance teaching universities (such as CCRTVU and SHTVU) and online programmes offered in traditional universities are evaluated by the national and local QA bodies for higher education. The national QA bodies include the Academic Degrees Committee of the State Council, the Committee for Higher Educational Evaluation, and the Institute for Assessing the Quality of Degree and Graduate Education in Institutes of Higher Education and Research. Separate evaluation criteria for assessing the quality for DE have not been reported in these cases.
- Hong Kong (China): The HKCAA (<http://www.hkcaa.edu.hk/>), established in 1990 as the only independent statutory accreditation authority, oversees the quality of educational programmes of DE and other non-UGC (University Grants Commission) funded higher education institutions.
- Indonesia: The National Accreditation Board for Higher Education (BAN-PT) accredits DE programmes using the instrument different from the one used for on-campus higher education institutions. However, no specific quality evaluation instrument for e-learning has been created by the BAN-PT.
- Malaysia: Similarly, distance teaching universities such as Open University Malaysia, need to be accredited by the National Accreditation Board and evaluated by the national QA standards for private DE set by the Department of Private Education of MOE, the body constantly monitoring the quality of every private institution in Malaysia.

- Japan: Establishing a new DE institution or programme is regulated by the University Establishment Standards and related regulations. In the recent system, standards and regulations to establish new universities were loosened and a new higher education quality assurance system was proposed. This new quality assurance system requires all the universities (including DE institutions) in Japan to be evaluated at the time of its establishment and re-accredited every seven years after the establishment (Wong, & Yoshida, 2001).
- Korea: In principle, the establishment of a conventional distance teaching university is required by the Higher Education Law to be approved by the MOE. However, the Korea National Open University (KNOU) has been the only conventional distance teaching university established in Korea under this Higher Education Law. The establishment of other distance teaching universities or virtual universities is required by the Lifelong Education Law, issued in 1999, to be approved by MOE. The revised Lifelong Education Law allows private institutions to establish degree-granting virtual universities using advanced technologies.
- UK: QA system of any DE is closely linked to the national QA framework for universities and colleges. A distance teaching university or programme is subject to at least three forms of external assessment undertaken by the Funding Councils and the Quality Assurance Agency for Higher Education just like any other HE institutions. Three kinds include assessments of: 1) subjects or teaching, 2) research, and 3) institutional performance and management.
- USA: DE programmes and institutions are accredited by the accreditation organizations recognized by the Council for Higher Education Accreditation (CHEA) and the US Department of Education. For example, the Penn State University's PS World Campus is periodically evaluated by the Middle States Association of Colleges and Schools. Within the QA framework of traditional HE, this association has developed specific QA guidelines for DE programmes. Out of nineteen accreditation organizations recognized by CHEA, seventeen have evaluated distance education including e-learning. The Distance Education and Training Council, a non-profit association founded in 1926,

gained an approval from CHEA and the US Department of Education as a nationally recognized accrediting agency solely for DE.

2) Separate QA framework for DE

Only few cases have developed a separate national QA framework for DE. Turkey and India have a separate committee or agency for assuring and managing the quality of DE.

- India: The Distance Education Council (DEC), a national apex body for distance education in India, was established in 1992 within the Indira Gandhi National Open University (IGNOU) with the mandate to promote open and distance education network, and to plan and implement schemes for ensuring quality in distance education in close collaboration with NAAC (Khan, 2001). Currently, one national distance teaching university (IGNOU), 10 state open universities, and 104 institutes of distance education within the conventional universities and colleges are under the supervision and financial support of the DEC. Within the DEC, the Open and Distance Education Assessment and Accreditation Board was created to appraise a distance education institution at intervals of 5 years, to see whether the institution or its programmes meets the prescribed norms and standards set by DEC.

The DEC has developed the Handbook of recognition process for DE institutions and programmes (<http://www.ignou.ac.in/dec/index.htm>). The Handbook includes criteria set for the approval of a new conventional distance education institution or programme. A distance education institution or an open university that considers application for approval or recognition is requested to fill out two kinds of forms, one: one for basic information, and another for detailed information. Major evaluation areas include: curriculum, self-instructional materials, faculty, evaluation, delivery methods, regional and study centers, infrastructure of study centers, staff at regional and study centers, building structure, land, administrative staff, financial resources, and vocational/technical/professional programmes.

- Turkey: Anadolu University, one of mega universities, reports that its QA system complies with the standards and requirements of the national QA body for distance education, that is, the Informatics National Committee

(<http://www.ii.metu.edu.tr/EMK/enfyoneng.htm>). This committee is a sub-committee of the Higher Education Council which oversees the quality of higher education in Turkey. DE courses are evaluated based on the quality and quantity of the course material, its structure, the use of interactive examples and questions, and the effectiveness of the components it incorporates for monitoring learning.

QA Mechanisms in Mega Universities

The results of a survey with nine mega universities³ (Jung, 2004b) shows that there exists a variety of QA systems of distance education even though the globalization and competitiveness of higher education and the development of technology have brought distance teaching universities closer together in terms of developing a common quality culture.

1) QA organizations

Several mega universities have set up a centralized total quality management system to coordinate and oversee the implementation of QA activities university-wide based on policies and guidelines formulated by QA-related boards or committees. Those centralized units are operated based on university revenue. Examples include UT (Indonesia)'s QA Centre, STOU (Thailand)'s Educational QA Coordinating Centre, AIOU (Pakistan)'s Research and Evaluation Centre, and OU (UK)'s QA team and a Pro-Vice-Chancellor for Learning and Teaching (Brennan, Hollow, & Shah, 2001).

A QA system of some universities has been set and run by the boards, the councils, and/or the committees rather than an independent QA unit in administration. Each body has distinctive roles in different stages of QA processes or in different areas of QA activities. At IGNOU (India), School Boards, Planning Committee, and Academic Council are responsible for overseeing QA policies and implementations. At Anadolu (Turkey), University Senate, University Executive Board, Academic Advisory Board, Course Accreditation and Review Committee, and Instructional Design Committee play a significant role in QA and accreditation.

³ the Allama Iqbal Open University (AIOU, Pakistan); the Anadolu University (Anadolu, Turkey); the China Central Radio and TV University (CCRTVU, China); the Indira Gandhi National Open University (IGNOU, India); the Universitas Terbuka (UT, Indonesia); the Korea National Open University (KNOU, Korea); the Sukhothai Thammathirat Open University (STOU, Thailand); the Open University (OU, UK); and the Shanghai TV University (SHTVU, China).

There are mega universities where QA is a part of responsibilities of one or more related administration offices. At CCRTVU (China), units responsible for assuring quality of distance education include the Educational Administration Division, the Centre of Learning Support Service, the Centre of Examination, and the Academic Assessment Office. KNOU (Korea) has a QA system where quality is not a specified responsibility of any particular post or office, rather it is a responsibility of all related offices and academic divisions. SHTVU (China) assigns QA responsibilities to the Department of Teaching Affairs. But specific QA activities are assigned to all related units of the University.

2) QA areas and criteria

Even though core areas – such as course and programme development and delivery - for QA are similar in most mega universities, some QA areas draw more attention than others. In some institutions, assessment of staff performance and tutoring services is emphasized whereas in other institutions, learner assessment or monitoring of e-learning courses gets more attention. Most of the mega universities tend to have more detailed criteria especially for QA areas such as Programme/Course Design and Development, Learner Supports, and Assessment. These areas are more directly related to student learning. AIOU, IGNOU, SHTVU, and KNOU put a great emphasis on QA in the areas of course/materials production and student support services.

Detailed QA criteria are provided in several mega universities surveyed. For example, IGNOU lists QA criteria for developing DE materials in self-instruction mode. All materials to be transformed in the self-instructional mode has to meet the criteria of self explanatory, self contained, self directed, self-motivating, self-evaluating, and self-learning. The faculty members are requested to transform the content into distance mode ensuring following the unit structure of 1) introduction, 2) objectives, 3) content exposition, 4) revision questions, 5) in-text questions, 6) summary, 7) terminal exercises, 8) supplementary material, 9) assignments, 10), suggested readings/reference materials, 11) learning activities, and 12) key words.

KNOU puts an emphasis both on content and instructional design of the materials. QA criteria for the content include: appropriateness of objectives, specification of objectives, accuracy and recency of the content, and clear organization of the content. QA criteria for instructional design include: appropriateness of teaching-learning strategies,

effectiveness of utilizing multimedia, appropriateness of screen interface, and convenience of course management. Other institutions have also devised similar detailed QA criteria for course development.

QA criteria during the delivery of DE programme have been reported in a few cases including UT, OUUK and IGNOU. One example can be found at IGNOU. IGNOU has suggested QA criteria such as timely dispatch of course materials, training of tutors and counselors in providing support to students, timely delivery of multimedia packages to study centres, regular tutorials and counseling sessions, timely feedback on assignments, timely response to students queries, feedback to students on their performance and progress, and facilitation of peer group interaction.

OUUK provides detailed QA criteria for services to students in regional centres. All the regional centres need to carry out an annual review of key activities: course choice, enrolment and fees, careers guidance, outreach and promotion, preparation, induction and learning skills development, student progress and retention, special needs, examinations and assessment, and exceptions and complaints. The findings of these reviews are shared between regions. Other activities, managed centrally or regionally, are reviewed on an ad hoc basis from time to time. Examples include: support for students with disabilities, the promotion of equal opportunities, marketing and collaborative provision (OUUK, 2004).

3) QA methods

A variety of QA methods are observed in the mega universities. The popular methods of QA include providing a wide range of opportunities for training workshops, conducting evaluation research, introducing internal review processes, and inviting external audits and assessments. In some cases, detailed guidelines or directions for assessing quality in selected key areas of distance education at the course and programme level are also provided.

The most prevalent method of QA is to provide training and professional development opportunities to faculty and staff including part-time tutors. The clearest examples are shown in several cases. OUUK specifies initial induction and training, and continuous staff development opportunities for its salaried staff, academic staff, and associate lecturers in the "Guide to Quality and Standards." Formal training sessions, workshops, resources, moderated online courses, and seminars are offered. SHTVU has offered

a series of training to its young instructors, academic staff, and part-time lecturers covering topics in course development and learner supports. Each institution at UT sets out personnel development programmes to equip its staff with competencies for effective task performance. IGNOU, KNOU and AIOU organize a series of workshops on course development for teachers.

Some mega universities go beyond internal training activities. For example, UT (Indonesia) has sent a selected number of its staff to a three month training workshop in the Netherlands in cooperation with the Netherlands' International Development Agency (NUFFIC) and Southeast Asian Ministers of Education Organization (SEAMEO) and other various international conferences, workshops and training on QA. International organizations such as UNESCO and COL have provided online training manuals and face-to-face training opportunities to distance educators.

Evaluation and monitoring of staff performance⁴ is another method to ensure the quality of distance education. AIOU monitors routine duties of its staff and also prepares a formal Annual Confidential Report that includes evaluation of staff performance by each section head in charge. CCRTVU uses feedback from teachers and students to assess the quality of courses and teaching activities. KNOU evaluates performance of tutors based on students' evaluation of their services and tutorials. OUUK implements a period of probation to all staff joining the University. During the period, the head of each unit is required to carefully and continually monitor the work of probationers. UT requests each unit to undertake self-assessment and self-monitoring, have a university-wide quality audit team visit, and finally receive feedback from top management (Zuhairi, Pribadi, & Muzammil, 2003).

The internal quality assurance system during the development of courses/programmes and materials is well integrated into the whole operations of most distance teaching universities. Whereas, the quality assurance procedure during assessment and examinations development is laid out in a few distance teaching universities. OUUK operates an Examination and Assessment Board for every course. At IGNOU, a marking scheme is prepared and made available to all examiners to avoid inter-examiner variability. AIOU reviews the process of student evaluation and makes

⁴ Some DE institutions such as Athabasca, OUUK, and UT have developed specific performance indicators so that they can monitor their performance against organizational objectives and key principles of their plan.

suggestions for improvement.

Involvement of external reviewers or/and experts during course development and material production is also a popular method of assuring the quality in most of the mega universities surveyed. KNOU, AIOU, IGNOU, UT, and STOU invite external experts in their QA processes. CCRTVU involves external experts, professors from national universities, and persons in charge of e-colleges to review its quality of programmes, courses, tutoring, and other services. OUUK seeks the three main external inputs to QA processes: the External Assessor for course in development, the External Examiner for examination at course level, and the External Advisor appointed at award level.

QA for E-Learning

E-learning, a relatively new form of DE, is rapidly becoming the dominant form of distance learning delivery especially in developed countries. And private or for-profit e-learning providers have expanded locally and internationally.

1) Growth of e-learning providers

Over the recent years, many DE providers have turned to ICT to improve their teaching and learning process, bridge the gap between increasing demand for education and limited resources, and export their programmes cross their own border.

In the Asia-Pacific region, main providers of the cross border education or e-learning include universities in UK, Australia, USA and global education providers such as Thomson Learning, Apollo International, and UNext. Hong Kong (China), India, Korea, Malaysia and Singapore seem to be main importers of those cross-border e-learning programmes. However, these countries and territories are also exporters of their e-learning programmes.

As in June 2000, in Hong Kong (China) around 550 cross-border educational programmes were provided by non-local providers. UK's programmes made up the largest share of 288 programmes (57%), followed by Australia with 157 programmes (31%) (Jegede, 2001). Canada, China, Ireland, Macau (China) and USA made up the rest. OUHK imports courses from the Open University UK, and Curtin University of Technology and University of Wollongong in Australia.

As one of the providers of cross border education, Curtin University of Technology, a Western Australia's largest university, has established partnerships not only with OUHK but also other HK institutions such as Management Association, Informatics Open Institute, and University of Hong Kong. Besides these Hong Kong (China) institutions, this university provides offshore DE to several countries in the Asia-Pacific region – China, Indonesia, Malaysia, Singapore, Sri Lanka, Thailand and Vietnam.

In 2003, OUUK had about 30,000 (14%) students who were located outside the UK. The University of Phoenix has 60,000 online students, with 4,000 from outside the USA (OECD. 2004). Cardean University, a for-profit e-learning organization, has one-third of its students outside the USA. In Latin America, the Technological and Higher Education Institute of Monterey (ITESM), a private university, has offered totally online degree programmes at both undergraduate and graduate levels to a good number of Latin American countries.

For-profit providers have expanded internationally. For example, in collaboration with Cardean University and Thomson Learning, EducAsia provides e-learning programmes in business and management to companies in Asia. Its programmes incorporate content from Cardean University and Thomson Learning, and are developed in association with leading universities around the world — including Stanford University, Columbia Business School, University of Chicago, London School of Economics, and Carnegie Mellon. EducAsia has offices in Korea, Singapore, and USA.

Apollo International, Inc., as an independent company by Apollo Group, Inc., provides higher education programmes for working adults in USA and several other countries. Drawing on the experience of Apollo Group's subsidiaries, the University of Phoenix, Inc., Western International University, Inc., the Institute for Professional Development, and the College for Financial Planning, it has already established two operations in India and is developing joint venture plans with China.

Universitas 21 Global, a joint venture between a Universitas 21 (consortium of 17 research universities including National University of Singapore, the University of Hong Kong, Korea University in Korea, and the Fudan University in China) and Thomson Learning is a new e-University with online MBA and other corporate training programmes, aiming primarily at students in Asian countries. It has its headquarters in

Singapore and offices in Dubai, Hong Kong (China) and Malaysia. The MBA programme is awarded by Universitas 21 Global which is registered by the Singapore Ministry of Education as a distance learning programme. In addition, the quality of courses offered by Universitas 21 Global is reviewed by U21 pedagogica (<http://www.universitas21.com/u21pedagogica.htm>), an independent accreditation body owned by Universitas 21.

1) QA for e-learning at national level

At the national level, some countries have developed QA guidelines for e-learning to provide supports to e-learning institutions, accreditation agencies and external reviewers. Examples in USA include:

- ADEC (American Distance Education Consortium)'s Guiding Principles for Distance Learning
http://www.adec.edu/admin/papers/distance-learning_principles.html
- IHEP (Institute of Higher Education Policy Quality)'s On the Line: Benchmarks for Success in Internet-Based Distance Education
<http://www.ihep.org/Pubs/PDF/Quality.pdf>
- DETC (Distance Education and Training Council)'s Accreditation Handbook
<http://www.detc.org/acredditHandbk.html>, and
- 8 regional accrediting commissions Best Practices for Electronically Offered Degree and Certificate Programs
http://www.ncahigherlearningcommission.org/resources/electronic_degrees/Best_Pract_DEd.pdf.

QAA in UK has developed guidelines on the quality assurance of distance learning (<http://www.qaa.ac.uk/public/dlg/contents.htm>), and the Joint Information Systems Committee has provided guidelines for e-Learning and Pedagogy as well (http://www.jisc.ac.uk/elearning_pedagogy.html). Those guidelines, in general, suggest nine categories constituting the quality of e-learning (Frydenberg, 2002): institutional commitment, technology, student services, instructional design and course development, instruction and instructors, delivery, finances, regulatory and legal compliance, and evaluation.

In Japan, standards for establishing a distance teaching university or a distance education programme within a conventional university specify methods of delivery, calculation of a unit of credit, requirements for graduation, and inclusion of a variety of

interaction mechanisms in case of e-learning (Jung, 2004a). The standards for offering asynchronous distance education such as e-learning require the institutions to provide opportunities for interaction through: interactive Q & A between teachers and students, discussions among students, an online advising system, quizzes, and a learning space for group activities.

Korea provides detailed criteria for quality assurance and accreditation for e-learning in the context of higher education. Unlike for conventional distance education, detailed criteria for establishing a virtual university (VU) and guidance for operating the university were specified in the Lifelong Education Law and its regulatory rules (Korea, MOE, 2003). In addition, the regulatory rules under the Higher Education Law have included specified criteria for establishing e-learning programmes such as online graduate schools within conventional universities. Major QA areas for establishment of a new virtual university cover: hardware and network establishment, course development system, quality assurance mechanism, student support services, vision and missions, and administration. Under each area, detailed evaluation criteria or standards have been set up. Criteria for establishing online graduate schools within conventional universities are found to be similar to those for virtual universities except tutor and student ratio of 1:20 is recommended to maintain highly interactive quality of graduate programmes.

The Distance Education Council (DEC) in India provides the Handbook and forms that specify quality assurance and accreditation criteria for conventional distance education institutions. However, those QA criteria and forms are not suitable for the assessment of e-learning programmes. In fact, no separate quality assurance and accreditation criteria for a virtual university or an e-learning programme have been developed in India. The NetVarsity, India's virtual IT education institution operated by a global information technology solutions corporation called the National Institute of Information Technology was not authorized to award degrees. The current requirements for accreditation include such factors as faculty qualifications, staff-student ratios, and space that are inappropriate for a virtual institution such as the NetVarsity (Mitra, 2003).

2) QA for e-learning at institutional level

A recent study reports that at the institution level, a separated QA system for e-learning has not been developed in most of the DE institutions including mega universities investigated (Jung, 2004b). Instead, most cases adopt the same QA criteria as they

use in QA for conventional DE to assess and manage the quality of e-learning programmes or courses.

KNOU, however, has developed more detailed criteria to monitor the quality of its e-learning courses and services. Besides its conventional DE courses, KNOU has offered 60 online courses on the Web. Three QA measures are taken during the development and delivery of e-learning courses. First, before developing any e-learning course, a review team, consisting of content experts and design experts, will evaluate the appropriateness of e-learning development and objectives, accuracy of the contents, and structure of the contents. Second, the review team, once a certain course is accepted as an e-learning course, will assess its pedagogical strategies, multimedia components, user interface, and course management functions. Third, two formal evaluation sessions will be administered during the development process. The e-learning site under development will be open to the public and the review team to be monitored. Comments from the public (including students) and the experts will be collected and used to improve the e-learning course.

Whereas KNOU has developed totally online courses, Open University Malaysia has integrated e-learning components into its conventional courses and thus introduced different QA measures for these e-learning components. During the course development, e-Module components will be examined by moderators and modified based on the comments given. Revised versions have to be approved by faculty. Monash has the Educational Design Group within its Centre for Learning and Teaching Support. This Group specifically assists with the evaluation of e-learning design. AIOU has adopted QA process in developing multimedia contents for its courses.

Even though some universities such as OUUK, Athabasca, CCRTVU, and SHTVU are actively incorporating e-learning components in their DE programmes, not specific QA measures for e-learning components have been provided. Anadolu University offers an e-MBA programme and is working on the details of a QA system for e-learning. PUCRS Virtual (Brazil) uses a commercially available virtual learning management system, WebCT, for its e-learning activities along with other advanced technologies. However, specific QA arrangements have not been reported in the survey questionnaire except the provision of pedagogical principles emphasized in the development and implementation of e-learning.

Besides these distance teaching universities, for-profit e-learning providers have developed QA measures as well. For example, the quality of faculty appointments, subjects, and degree programmes offered by Universitas 21 Global is reviewed by U21 pedagogica (<http://www.universitas21.com/u21pedagogica.htm>), an independent accreditation body owned by Universitas 21. In addition, U21pedagogica offers services to a wide variety of clients, including universities, higher education consortia, and government agencies.

Implications of GATS on QA in DE

From the discussion above, one can conclude that QA systems of cross-border distance education are at an early stage of development and specific QA procedures and guidelines for DE including e-learning are yet to be developed.

Cross-border education is a reality today. And it is certain that ICT will be used to a growing extent for cross-border education. E-learning will develop alongside and as part of traditional cross-border education. In fact, many of the current cross-border activities and related policies are unconnected with, or unaffected by, the GATS. Even if a country decides not to make any commitments under the GATS on education services, trade in education will grow. (In fact, education services rank amongst the least committed of all sectors under the GATS. And only four countries – Australia, Japan, New Zealand, and USA – have submitted negotiating proposals.) Policies regarding QA and accreditation are always important in educational trade with or without the GATS. What GATS commitments mean to cross-border distance education would be to put pressure on governments and DE providers to tackle QA issues, to promote transparency in cross-border activities, and eventually to protect learners from receiving poor quality distance education in cross-border. Implications of GATS on QA in distance education including e-learning can be discussed from the following four aspects.

1) To review and strengthen existing national QA framework

GATS creates increasing pressure for augmented efforts in reviewing the existing QA frameworks of DE at national and institutional levels, and maybe in strengthening them in view of cross-border challenges. Quality is a common concern both in exporters and importers of cross-border education. Especially, given the increasing number of

for-profit providers and ICT-based innovative delivery, quality is becoming the most pressing issue in recent distance education including e-learning. And fraud by degree mills or accreditation mills is more serious with cross-border e-learning since e-learning institutions can more readily than traditional organizations escape the QA regulations. QA of international DE programmes, and private and for-profit DE services need to be addressed in the national QA frameworks.

Some countries have recognized the shortcomings of their national QA systems for DE with regard to transnational trade in education and e-learning, and begun to create new QA arrangements (Van Damme, 2002). For example, UK has developed specific guidelines for QA of DE even though it has treated all distance teaching institutions the same as other traditional institutions. The US Department of Education recently has developed the database which lists approximately 6,900 postsecondary educational institutions and programmes including DE institutions, each of which is accredited by an accrediting agency or state approval agency recognized by the US government. At the institutional level, several distance teaching universities and e-learning institutions have developed a more coherent and comprehensive QA organizational structure to coordinate and oversee their various QA activities. Examples include UT in Indonesia, OUUK, universities in Australia and some for-profit e-learning providers.

In the future, distance education including e-learning will certainly dominate the cross-border post-secondary arena and continuing education market of the professional development. There will be more and more requests to validate the credentials of cross-border DE institutions and the quality of programmes and services in those institutions. One important implication of GATS on cross-border DE in this context is to urge governments and DE institutions to review own QA frameworks and to develop appropriate QA regulation before market opening.

2) To promote cross-border QA activities

It is certain that GATS promotes informal and formal, and regional and global networks of quality assurance activities of national QA agencies and DE institutions. Since 1995 when educational services became subject to the GATS, many countries and QA agencies have been more actively discussing several issues including QA and accreditation related to cross-border education. Some countries such as USA have developed international database of QA agencies and information. Some countries such as UK and Australia have made their own QA system for higher education

including DE known to the world. Regional QA arrangements have been discussed as well. At the international level, the International Network of Quality Assurance Agencies in Higher Education (INQAAHE), the most representative QA association with a world-wide membership, has lead debates, created QA related projects, and fostered QA data sharing. And UNESCO and OECD have developed new guidelines and elaborated existing conventions on trade in educational services.

A variety of these cross-border QA discussions and projects have focused on trade in conventional higher education. It is only recent efforts that challenges with QA in distance education have been included as an agenda for international debates. It is surprising that increased international competitiveness and transnational services in higher education only had a marginal impact on cross-border QA activities in distance education. Even so, there have been increasing international debates on QA issues in distance education. As results, several international guidelines, conventions and best practices have been developed and reported⁵. For example, recent UNESCO/OECD guidelines for quality provision in cross-border higher education provide recommendations for six stakeholders. However, we still need to ask whether these international efforts are sufficient to meet the need for commonly accepted conventions and standards of quality DE including e-learning. The key to successful quality assurance activities in the future lies in commitment of distance education institutions and governments to international debates and international decision making processes related to QA issues.

3) To promote capacity building

It is apparent that the GATS negotiations have impacts on liberalization in education market. A country that decides to make commitments under the GATS on education services is free to set restrictions or develop new regulatory structures with regard to the liberalization of education services. The existing QA regulations often do not address challenges in recent and future cross-border DE markets. In order to set appropriate restrictions and develop effective regulatory QA frameworks for distance education,

⁵ [UNESCO/OECD guidelines on quality provision in cross-border higher education](#) ; [UNESCO' the Open and Distance Learning \(ODL\) Knowledge Base project](#); [COL, Perspectives on Distance Education: Quality assurance in higher education – selected case studies](#); [COL, Policy for Open and Distance Learning](#); [OECD Forum on Trade in Education Services](#); [World Bank, The Global Distance EducationNet \(Global DistEdNet\)](#)

countries and DE institutions need to build regulatory capacity before market liberalization. In this context, GATS promotes capacity building for QA in DE.

Capacity building in QA for DE is especially important since DE provides higher education to millions of students around the world with collaboration or in competition with for-profit or cross-border providers. One survey (Jung, 2004b) finds that at least half of the mega universities have provided continuous staff development opportunities to their academic and administrative staff in pursuit of quality improvement. International organizations such as UNESCO, COL, OECD and World Bank have provided useful QA training resources or workshops for distance educators. But still many countries and institutions face challenges in terms of lack of QA regulatory capacity in DE including e-learning. GATS promotes capacity building efforts of governments and DE institutions so that the QA regulatory framework needed can be in place before decisions about liberalization.

4) To protect DE learners

It seems that one of the most important implications of GATS lies in consumer protection. Especially from the viewpoint of countries importing DE services, learner protection is a main reason for QA concerns. Those countries need to ensure that their people receive quality education when they enroll in those invisible DE or e-learning programmes. In fact, learner protection rationales extend to the socio-economic level. Those who have been trained in fraudulent or poor quality DE institutions may damage the societies for which they work (OECD, 2004). Countries providing cross-border DE have adapted QA standards to innovative delivery or developed new guidelines to ensure the quality of DE in order to address the concerns of receiving countries and to maintain their brand image in providing high quality DE. For example, UK QAA produced the Guidelines on the Quality Assurance of Distance Learning in 1999 (QAA, 1999), and the New Zealand Universities Academic Audit Unit issued the guide to External Quality Assurance for the Virtual Education in 1999 (Van Damme, 2002).

Establishing databases on QA frameworks and accreditation in DE including e-learning is one way to share information with potential learners world-wide and to promote transparency in domestic QA regulations. Such efforts have been made in a rather limited capacity by some countries such as USA, UK, and Australia. INQAAHE has compiled information on current and developing theory and practice in QA in higher education. UNESCO has been discussing the development of a database on QA

agencies and accredited higher education institutions including DE institutions in pursuit of learner protection in a cross-border educational environment.

Finally, there is an issue of fraudulent DE providers. The invisible and transnational nature of DE including e-learning sometimes makes it difficult for learners to find out whether a foreign DE institution really exists and what its quality is. And even worse is that when fraud cases happen, learners have no place to go. With the increase trade in education, we need to address those challenges in QA of DE from international learners' point of view.

Conclusions

QA practices in DE including e-learning reported in this paper show an increasing convergence in a quality culture in DE and at the same time, a diversity in QA systems and standards at national and institutional level. The GATS on education services has facilitated international discussions on QA issues in cross-border education in general. To develop reasonable solutions to important QA issues in cross-border DE, we need to collect comprehensive and reliable statistics on the delivery of DE and e-learning programmes in cross-border, share QA practices in DE institutions and learner experiences with cross-border DE programmes, and develop more transparent and fair QA procedures for domestic and foreign DE providers. All these ask for strengthening international cooperation and networking, and sharing information on QA frameworks.

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