



Distance Education Certification Program Overview, Policies and Procedures

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ARELLO® Distance Education Certification Program Overview

ARELLO® certifies course design and delivery systems of distance education courses. Content review is the responsibility of individual jurisdictions.

I. Objectives of the Distance Education Certification Program

- To foster excellence in professional education by developing standards and guidelines for the evaluation of design and delivery of distance education courses, while recognizing and respecting the diversity of courses.
- To promote educational and ethical standards of professional education.
- To provide assurance that professional distance education meets established standards of acceptable quality.
- To provide guidance to providers in the continued improvement of distance education offerings.
- To ensure that the certification process evaluates the presence of essential resources and processes of providers relative to program goals and objectives.
- To encourage providers to view self-study and evaluations as a continuous obligation for improvement.
- To provide feedback that will stimulate improvement of educational offerings.
- To ensure that the evaluation, policy and decision-making processes undertaken by the certification program reflect the interests of program stakeholders.

II. Requirements for providers seeking certification

Providers applying for Distance Education Course Certification must demonstrate that they satisfy each of the following general requirements:

- A. Providers must have a stated mission and objectives that are appropriate to professional education.
- B. Each learner, potential learner, or other interested person is provided an accurate and complete description of courses offered.
- C. Providers do not discriminate with respect to age, sex, ethnic background, color, creed, or disability.
- D. Providers demonstrate they have adequate resources to develop and provide ongoing support of the course and learners.

III. Applying for certification

Course Certification

The provider must submit the appropriate application and any necessary documentation for the review. The application serves as a self-evaluation of the distance education practice of the provider. There are separate applications for primary and secondary providers. These applications can be found on the ARELLO® Distance Education Certification Program webpage.

A primary provider is a course developer who has a proprietary interest in the product. Primary providers may develop the course or may hire someone to develop it. Primary providers may market the course themselves, have their own certified instructors deliver it and/or may sell it to secondary providers.

A secondary provider obtains a course from a primary provider. They also have certified instructors and are responsible for monitoring learner progress and verifying course completion and learner identity. Secondary providers provide opportunities for interaction, support, administrative communications, and assessment or evaluation feedback. All critical components of delivery need to be measured next to the ARELLO® Distance Education Standards.

Types of Course Certification

Initial Certification – certification granted for the first course in a delivery method. Each new delivery method is considered an initial certification application.

Subsequent Course Certification – certification granted for a new course in a delivery method that has been previously certified.

Recertification – renewal of a certified course every three (3) years with no substantive changes.

Substantive Changes – substantive changes require submission of a new application.

Review of Courses

ARELLO® engages the services of independent distance education consultants (referred to as “Reviewers”) who will perform course design and delivery reviews. The Reviewers are selected based on established criteria to ensure they possess exemplary qualifications.

Confidentiality During Review

During the review of an applicant’s submission, access to the application and any supporting documentation submitted, is restricted to ARELLO® personnel involved in the certification process. ARELLO® personnel shall take appropriate steps to protect the intellectual property, copyrights and trademarks of applicants. Once an applicant’s submission is approved and certification has been communicated to the applicant, the applicant’s identity will become

public record. The application package then may be shared, upon request with ARELLO® regulatory members. The applicant will be notified when the application package has been provided to a regulatory member.

Compliance After Certification

Throughout the certification, courses must be maintained in compliance with the ARELLO® Distance Education Standards. ARELLO® may audit courses for compliance throughout the certification period. Certification may be suspended or revoked for noncompliance.

Fees for Three-Year Certification

All fees must be paid directly to ARELLO®. Course reviews will not start until the appropriate fee has been paid.

Primary Provider (Course Developer)

- \$865.00 for the first course offered via each delivery method
- \$655.00 for the second and subsequent courses offered via the same delivery method
- \$495.00 for recertification
- \$100.00 penalty for late recertification application

Secondary Provider

- \$290.00 for the first course offered via each delivery method
- \$235.00 for the second and subsequent courses offered via the same delivery method
- \$205.00 for recertification
- \$100.00 penalty for late recertification application

Other Fees

Supplemental ARELLO® Certification - \$160.00 per course

When applying for certification, a provider has a choice of ARELLO® or IDECC® Certification. The supplemental certification option allows the provider the option to have both the ARELLO® Certification Certificate and the IDECC® Certificate available.

Distance Education Certification Program Policies and Procedures

ARELLO® Distance Education Standards are applicable for a variety of delivery methods and education models that utilize any number of different technologies. This policy document has been created to provide additional specificity to the ARELLO® Distance Education Standards and pertains to the design and delivery of distance education courses. ARELLO® uses these policies with the Standards to measure the quality of courses submitted for Certification. All providers are required to meet the minimum requirement for each policy.

Failure to comply with the responsibilities listed in this document shall be grounds for suspension or withdrawal of its grant of certification from ARELLO®. The sanctions against certified courses by ARELLO® are appealable under the procedures set forth in this document.

Application Policies and Procedures

Policy 1: The appropriate application must be submitted.

Procedure 1a: An application is required with each submission, both certification and recertification. Each course is reviewed and evaluated in accordance with the ARELLO® Distance Education Standards.

Procedure 1b: Once a provider has completed the application, a submission can be made online through the Course Management System. To obtain a provider profile within our program, please contact the ARELLO® Director of Distance Education.

Procedure 1c: Once the appropriate application, any other documentation, and payment have been received, the course is assigned to a reviewer who may contact the provider via the Course Management System for additional information as deemed necessary to complete the objective evaluation. The length of this review process is variable based on the course submitted.

Procedure 1d: The provider must provide access to the online course as a learner would access it. The provider must also provide access to the course in review mode. The review will not begin until access is granted within the course.

Procedure 1e: Application fees are non-refundable.

Procedure 1f: A provider who submits an incomplete application will have thirty (30) days to comply with ARELLO® application requirements. If a provider fails to submit a complete application, the application will be cancelled and fees forfeited.

Policy 2: ARELLO® may deny certification of any course submitted by a provider.

Procedure 2a: ARELLO® may deny certification to any course that does not meet the ARELLO® Standards based on the review.

Procedure 2b: During the course review, the ARELLO® Reviewer may cite deficiencies in the submission for certification. The provider will have forty-five (45) days to remedy the deficiencies cited by the reviewer. If the provider has not responded within that timeframe, the application will be deemed abandoned and fees forfeited. After the provider has notified ARELLO® that the deficiencies have been remedied the course will undergo a final review. If the course does not meet the Standards at that time, the course will be denied. If the course is submitted again in a new submission, ARELLO® shall assign the course to a different reviewer.

Procedure 2c: To help ensure public protection against course providers that may operate unethically, ARELLO® may deny certification of any course submitted by a provider whose owners and/or instructors have a documentable record of breaching public trust. Breaching public trust may include but is not limited to felony convictions, and/or disciplinary action on a jurisdictional license. ARELLO® reserves the right to perform limited background checks on those owners or instructors associated with certified courses. Organizations denied certification on this basis may appeal using the procedures described in these policies. Course content is expected to be original or appropriately referenced. Courses containing plagiarized content will not be approved.

Policy 3: Certification is granted when a submission is in compliance with the ARELLO® Standards.

Procedure 3a: The provider will be promptly notified through the Course Management System when the course has been certified.

Procedure 3b: A summary certificate listing a description of the course will be published online as proof of certification on the ARELLO® and/or IDECC website. Certificates are available for download in the Course Management System immediately and can be found in the provider profile under “Manage Certified Courses.”

Course Design Policies and Procedures

Policy 4: Distance education courses are required to have a learner orientation.

Procedure 4a: The orientation must be provided prior to the learner beginning the course.

Procedure 4b: The orientation must contain:

- the name and direct contact information of the instructor;
- instructor response time;
- course description;
- prerequisites for the course (if any);
- criteria for successful completion of the course;
- exam information;
- refund policies;
- equipment and system requirements;
- any relevant state or jurisdiction specific requirements; and
- technical support availability and contact information.

Procedure 4c: The orientation must contain a mandatory acknowledgement by the learner that the learner has read and understands the orientation.

Procedure 4d: Secondary providers must provide their own orientation.

Policy 5: Distance education courses are required to have learning objectives.

Procedure 5a: The learning objectives must describe the expected outcomes of the learning process and how well the learners are expected to master the content at the intended level.

Procedure 5b: Learning objectives must follow Mastery Based learning principles and must be written in performance terms utilizing Bloom's Taxonomy.

Policy 6: All courses submitted for Certification are required to have quantifiable evidence of clock hour request.

Procedure 6a: Providers are required to submit written documentation of timing justification. A written rationale for why the amount of content in the course justifies the amount of time requested is required.

Procedure 6b: ARELLO's® methods for quantifying course timing vary based on the type of instruction, as follows:

1. Course Text - The course provider must submit a document or chart containing reference to the text quantifying the number of words included in the course

content. The following measures will be used to calculate the amount of time a learner will spend reading the course content for comprehension:

- a. Basic level courses – 250 words per minute
 - b. Intermediate level courses – 200 words per minute
 - c. Advanced level courses – 150 words per minute (A written justification must be submitted for courses claiming advanced level.)
2. Instructional Elements – Instructional elements are components through which content may be delivered. With each course submission, the provider must submit documentation summarizing the amount of course time for the instructional element. The following guidelines should be used for calculating the amount of time a learner will spend with these instructional elements:
- a. External Links – The content included on an external website can only be counted in course timing if the course instructions require that the learner read the content and mastery of the content is included in the assessments.
 - b. Interactive Exercises – Instructional elements such as matching exercises are often used to reinforce course content. If a provider requests that these instructional elements be included in course timing the provider must submit documentation listing the amount of time a learner should spend with each exercise.
 - c. Video/Audio Content – Provider must provide the actual amount of time it takes to cover the content. An assessment must immediately follow the video/audio content and must measure mastery of the content. If the video/audio content is an instructional element of the course in review, the provider is required to inactivate the fast forward functionality of the video/audio.
 - d. Diagrams and Forms – When courses contain diagrams or images that convey course content and/or practice forms that have to be filled out, the provider must document the projected amount of time that a learner would spend with each instructional element.
 - e. Other instructional elements – As with diagrams and forms, any instructional element other than text must be submitted with a written projection of the amount of time a learner would spend with the element.
 - f. Assessments – Required assessments may be included in the computation of course time. Lower order assessment items (true/false, standard multiple choice) are included at 30 seconds each. Higher order assessment items such as questions based on case studies or multiple-choice questions with plausible distractors are included at one minute each. Remediation will not be counted toward clock hours.
 - g. Review Sections – Course content that is repeated for the purpose of review cannot be counted in course timing computations.

Procedure 6c: Time studies are also required to assess appropriate clock hours. Two methods are available for providers to meet the time study requirement.

- The provider can have 10 individuals of an appropriate sample audience complete the course and fill out the Time Study Participant form. Please note learners must complete

the affidavits provided by ARELLO®. The reports received in any other manner will not be accepted.

- The provider may have two qualified professionals, who are experienced with course content and instructional design, complete the course and attest to the appropriate time by completing the Time Study Participant Form.

Procedure 6d: ARELLO® will only certify courses for a fixed number of clock hours. No variation or range of the clock hours shall be approved.

Procedure 6e: During the course review, ARELLO® Reviewers will conduct their own time analysis to ensure the integrity of the provider's time study. ARELLO® Reviewers reserve the right to reject time studies not validated by their own time study and require a provider to resubmit new time studies. If ARELLO® finds that its time study substantially differs from the one provided by the course provider, one of two actions will occur:

- The course will be certified with a reduced number of clock hours
- Certification for the course will be denied

Procedure 6f: Time studies are not required for courses taught completely by synchronous delivery; however, providers will still be required to submit written documentation of timing justification.

Procedure 6g: ARELLO® recognizes an instructional hour as 50 minutes.

Policy 7: All courses submitted for Certification are required to have time tracking functionality.

Procedure 7a: Providers are required to have a learning management system (LMS) or presentation platform in place that quantifies the amount of time learners spend in a course. This includes time reading content, taking assessments, and participating in other instructional activities. This requires documentation of learners' average completion in a course. Providers will be required to show evidence that their LMS or presentation platform has time tracking and reporting capability during the initial certification and recertification reviews. Learner affidavits or "personal testimony" affirming course time are not accepted at recertification as a means of documenting that a course is taking learners the appropriate amount of time to complete.

Procedure 7b: If the course is offered via secondary providers, the secondary provider will need to quantify the time learners are spending in the course for recertification. Primary providers are required to give secondary providers access to reports in the primary provider's LMS or presentation platform that allows them to view how long their learners are taking to complete a course. This information will be required to show evidence of this capability during the initial certification and recertification reviews.

Policy 8: Distance education courses are required to have interactivity.

Procedure 8a: Interactivity is a critical part of the learning process for distance education. ARELLO® requires that all courses have learning strategies that provide interactivity throughout the course.

Procedure 8b: ARELLO® requires the evidence of interactivity. There are three types of interaction: learner-to-content, learner-to-instructor, and learner-to-learner, as described in the ARELLO® Distance Education Standards.

Procedure 8c: ARELLO® requires evidence of learner-to-content interaction. Examples of learner-to-content interaction include, but are not limited to, links to vocabulary words, supplemental reference material, exercises, quizzes, final exams and remediation exercises. It should be noted that “clicking” does not constitute learner-to-content interaction. Providers must ensure that each learner participates in all interactions in order to receive a certificate of course completion.

Procedure 8d: ARELLO® requires evidence of learner-to-instructor interaction. Examples of learner-to-instructor interaction include, but are not limited to, interaction at the time of orientation and interaction during a course by answering learner questions. The instructor’s direct contact information must be provided to the learners.

Procedure 8e: ARELLO® encourages learner-to-learner interaction where practical and appropriate.

Policy 9: Distance education courses are required to have assessments and use remediation within the course design.

Procedure 9a: Pretests are given prior to a learner taking the course and are used to measure the learner’s level of understanding. Pretests are not required for certification; however, they do serve as interactive elements that can be attributed to a course.

Procedure 9b: Incremental assessments should be designed to properly measure whether or not mastery of the material has been achieved. Incremental assessments are considered to be quizzes given throughout each logical unit of instruction. These assessments should be properly designed to ensure questions are not simplistic and are not repetitive. Assessment items should be tied to course objectives. A map of the item-to-objective relationships must be documented.

Procedure 9c: ARELLO® requires a minimum of 10-12 incremental and/or required summative assessment items be posed per hour of instruction for the course. For example, if the course is designed to be 3 credit hours, this course must have, at the minimum, 30 incremental assessment items presented to the learner. ARELLO® will examine the number and type of assessment items to ensure the instrument appropriately measures the course objectives. True/false questions cannot constitute more than 10% of an incremental assessment. Providers

must ensure that each learner participates in all incremental assessments in order to receive a certificate of course completion.

Procedure 9d: Summative assessments are highly recommended but are not required for ARELLO® Certification. Summative assessments are utilized at the end of a course to ensure mastery over all the material presented to the learner. Summative Assessments should be properly designed to not consist of identical assessment items as in the incremental assessments. True/false questions are not allowed in summative assessments.

Procedure 9e: Incremental (quizzes) and summative (final exam) assessments are required to be developed using assessment bank systems with random item selection to measure each learning objective, or a similar process, to ensure the integrity of the assessment. ARELLO® requires the use of a 3:1 ratio of questions stored to questions presented.

Procedure 9f: Providers must ensure that questions in the bank provide adequate distribution across objectives being measured. Providers are required to submit all assessment banks with answers to ARELLO® for the review process.

Procedure 9g: Remediation is required within the course and takes place during the process of an assessment. Remediation involves providing a learner who has answered an item incorrectly with an indication of why their answer was incorrect. The following are not considered adequate remediation: giving the learner an immediate opportunity to retake an identical question, or providing the learner with the correct answer without providing an accompanying explanation. Remediation must be implemented as a part of the required incremental assessments. ARELLO® Reviewers will evaluate remediation strategies on a course-by-course basis.

Procedure 9h: Instructional designers and course developers should be familiar with Benjamin Bloom's Taxonomy of Educational Objectives for categorizing the level of cognitive skills that commonly occur in educational settings. Bloom's Taxonomy provides a useful framework in which to write learning objectives and assessments to measure learning outcomes. Ideally, and unless learning objectives state otherwise, instructional designers should design assessment items that incorporate a variety of questions that would range from the knowledge level on through the application, analysis, synthesis, and evaluation levels.

Policy 10: Distance education courses are required to have evaluations of the learning experience.

Procedure 10a: All courses certified through ARELLO® are required to have an evaluation of the learning experience. The evaluation must assess the effectiveness of the instructor, course delivery, and course content. This important feedback tool allows the provider to continue their commitment to providing quality distance education.

Procedure 10b: Tabulation of the responses to each question presented in the evaluation is required for recertification of the course. All comments must be provided.

Policy 11: All courses submitted for certification are required to have a qualified instructor.

Procedure 11a: ARELLO® certified courses are required to have an instructor with a current Certified Distance Education Instructor (CDEI™) designation. ARELLO® requires a qualified instructor for every certified course.

Procedure 11b: Learners taking distance education courses require instructional support that can only be provided by a qualified course instructor. The CDEI™ instructor must possess the knowledge and experience necessary to teach the course for which they are approved.

Procedure 11c: Subject Matter Experts (SMEs) providing content support or learner support must hold a current CDEI™ designation.

Procedure 11d: The instructor must be trained in the use of the learning management system (LMS) or presentation platform by the provider. Primary providers must provide access to the LMS or presentation platform. The approved CDEI™ instructor must monitor learner progress in the course.

Procedure 11e: Instructor credentials must be submitted with the application and reflect experience and expertise in the subject matter and the distance delivery. If instructors are changed or added, the credentials must be submitted and approved by ARELLO® before they can teach or instructionally support the course.

Procedure 11f: Instructor contact information is required to be provided to the learner in the course orientation/syllabus, and available throughout the course. Learners must be able to contact the instructor for any content questions. This contact information is to be clearly identifiable as the course instructor's direct contact information.

Procedure 11g: Secondary providers must provide the CDEI™ instructor's direct contact information on their orientation page.

Procedure 11h: Providers shall provide a policy manual for instructor selection and management. The policy must include, but is not limited to, criteria for instructor selection, instructor development plan, training on the learning management system, and instructor-to-learner response time expectations.

Procedure 11i: The provider will need to take into account the number of courses an instructor is assigned. The instructor's main focus is learner support and this support cannot be diluted because of the number of courses s/he has been assigned. ARELLO® will evaluate the number of courses an instructor has been assigned and reserves the right to request a different instructor for the course if it appears that the instructor's course load makes proper learner support unlikely.

Procedure 11j: In order to be approved as the instructor for the course, the instructor applicant must provide evidence of either having been involved in the development of the course or having successfully completed the course.

Policy 12: All courses are required to provide secure and accurate documentation of learner identity.

Procedure 12a: Providers must explain what methods and tools are utilized to ensure proper sufficient proof of learner identity.

Procedure 12b: Some jurisdictions may require a signed affidavit from the learner attesting to the learner's identity and completion of the course. Providers must maintain these affidavits in compliance with the respective jurisdiction's requirements.

Course Delivery Policies and Procedures

Policy 13: All courses submitted for certification are required to have learner support services.

Procedure 13a: Providers are required to give learners an orientation for the course. Learners are required to receive a syllabus and/or learner manual to ensure they have all requirements, policies, and directions given to them prior to the start of the course. Items in the syllabus or learner manual should include but are not limited to:

- instructor's direct contact information for instructional support;
- technology requirements;
- prerequisites for the course;
- how a learner will obtain a certificate upon completion of the course;
- how credit will be reported to regulatory agencies if applicable;
- how much time the learner has to complete the course;
- links to the school's policies on cheating or misrepresenting learner identity; and
- refund policies.

Procedure 13b: Learners must have adequate access to the range of services necessary to support their learning.

Policy 14: Providers are required to monitor learner progress.

Procedure 14a: Providers must monitor the qualitative characteristics of the course such as course completion and dropout rates, remediation frequency, course completion times, instructor response times and interactivity.

Procedure 14b: The approved CDEI™ instructor must monitor learner progress throughout the course.

Policy 15: If a primary provider has a relationship with a secondary provider, the primary provider must supply the secondary provider with the necessary support.

Procedure 15a: The secondary provider will submit documentation that clearly states the responsibilities of the primary and the secondary provider at time of certification. It should be clearly documented which provider is responsible for support services to the learner.

Procedure 15b: ARELLO® requires primary providers to develop a reference manual for secondary providers. The secondary provider's manual should contain but not be limited to:

- instructional strategies for the secondary provider that may enhance the course.
- information on how to access administrative features of a course used in monitoring learner progress.

- suggestions on how to offer timely and quality instructional support.
- information pertaining to course design and delivery that may be necessary for secondary providers to obtain prior to receiving ARELLO® Distance Education Certification.
 - For example, a manual might include comments on the course instructional design that would help secondary providers understand how to answer the necessary questions on the secondary provider application form for certification.
- technical support information.

Procedure 15c: Secondary providers must be trained in the use of the learning management system (LMS) or presentation platform by the primary provider. Primary providers must also provide access to the LMS or presentation platform.

Procedure 15d: The instructor for the secondary provider must complete the course and submit the certificate of completion with the instructor application.

Procedure 15e: Secondary providers must provide their own course orientation that complies with the requirements of Policy 4.

Certification Maintenance Policies and Procedures

Policy 16: Providers must give advance notice of substantive changes to a course.

Procedure 16a: A provider considering substantive change(s) to a course(s) should notify ARELLO® in writing of any proposed changes sixty (60) days in advance of the change.

Procedure 16b: Substantive changes are generally defined as any changes in the course that will affect the certified instructional design and/or delivery. Substantive changes may be:

- changes in course clock hours;
- major content revisions;
- new administration and/or owners;
- new facilities or locations; or
- additions, removals or modification of course instructors.

Procedure 16c: ARELLO® may require fulfillment of certain application requirements, depending on the nature of the change(s) to the course(s).

Policy 17: Providers must file an application for a renewal of certification every three (3) years.

Procedure 17a: Prior to the expiration of certification, it is the provider's responsibility to file an application for a renewal of certification. Recertification for each course is required every three (3) years.

Procedure 17b: In order to continue to use the "ARELLO® Certified" credential for these courses, providers must successfully complete the recertification process for each course.

Procedure 17c: Application for recertification shall be submitted at least 90 days prior to the expiration of the current certification period. An application is deemed timely submitted if it is electronically submitted on or before the deadline.

Procedure 17d: If ARELLO® needs additional time to consider and take final action on the application for recertification, ARELLO® may extend the current certification period for up to 120 days.

Procedure 17e: If the application for recertification is submitted within the 90-day period of the expiration date, a late recertification fee applies. Unavoidable circumstances such as documented medical emergencies and natural disasters do not warrant a late recertification fee.

Procedure 17f: The course will not be eligible for recertification after the expiration date and must be filed as a new course.

Policy 18: Courses must be offered as they are certified.

Procedure 18a: Providers representing a course as ARELLO® certified to regulatory agencies or the public, have the responsibility of only advertising and offering the course as it was certified.

Procedure 18b: Providers are prohibited from manipulating the instructional design of the course and offering the course as certified without approval by ARELLO®.

Policy 19: Providers may not use the ARELLO® certification logo without current certification.

Procedure 19a: Only after ARELLO® grants certification may a provider utilize the ARELLO® certification logo and so denote its certification status. Providers may advertise certified courses as “Course Design and Delivery Certified by the ARELLO®” as long as certification is current and in good standing. Courses that are advertised as ARELLO® certified must be offered as certified.

Procedure 19b: Secondary providers may not advertise that a course is ARELLO® certified unless:

- The primary provider has submitted the course and been granted certification; and
- The secondary provider has also submitted the course to ARELLO® and been granted certification.

Procedure 19c: Providers advertising certified courses shall ensure that the delivery method, course titles, and clock hours advertised are consistent with what is listed on the ARELLO® certification summary certificate.

Procedure 19d: While certified, providers must use the ARELLO® certification logo or “Course Design and Delivery Certified by ARELLO®” on learners’ course completion certificates.

Policy 20: Providers must notify ARELLO® of any change in provider accreditation, approval or jurisdictional licensure status.

Procedure 20a: A provider of any ARELLO® certified course must notify ARELLO® within thirty days (30) of any denial, suspension, revocation, probation, or any other final or interim adverse action affecting any accreditation status of the provider.

Procedure 20b: A provider who has been granted certification must notify ARELLO® in writing of any state agency or other regulatory body attempting to withdraw approval or licensure of the institution or any of its courses, programs or instructors.

Procedure 20c: An instructor who is convicted of or pleads guilty or nolo contendere to any crime other than a traffic violation must make written report thereof to ARELLO® within thirty (30) days after the conviction or plea.

Course Audit Policies and Procedures

Policy 21: ARELLO® is authorized to perform course audits.

Procedure 21a: ARELLO® may, on its own motion, or on behalf of a stakeholder, perform a course audit or investigate a complaint and any evidence presented in connection with the complaint.

Procedure 21b: At any point during the time a course is certified, ARELLO® may perform the following enforcement procedures for primary and/or secondary providers that include but are not limited to:

- anonymously audit courses;
- randomly check courses to ensure course design is consistent with the certification;
- request that the provider document historical information pertaining to learner completion time;
- request that the provider document evaluation data from learners that have completed the course;
- request that the provider verify course orientation;
- request documentation of instructor interaction with learners;
- monitor the advertising regarding certified courses; and
- other concerns brought to our attention by stakeholders of the program.

Appeal Policies and Procedures

Policy 22: Any stakeholder may appeal decisions made by ARELLO®.

Procedure 22a: Decisions made by ARELLO® that may be appealed are issuance, denial, revocation, suspension or withdrawal of certification or recertification.

Procedure 22b: Stakeholders may dispute the decision made by ARELLO® through the review appeal process.

Procedure 22c: Appealable actions are limited to four grounds as follows:

1. ARELLO® or its agents failed to consider all the evidence and documentation presented in favor of a provider's application or audit documentation.
2. ARELLO® or its agents acted erroneously by disregarding its own Standards, Policies and Procedures.
3. There was a bias demonstrated by ARELLO® or its agents.
4. The evidence provided to the course reviewers at the time of the decision was materially in error.

Procedure 22d: The appellant must submit a written appeal to the ARELLO® CEO no later than thirty (30) calendar days from the date of the contested decision. All documentation supporting the appeal must be submitted to the CEO.

The appeal must relate to one of the grounds cited in Procedure 22c and justification must be provided in writing.

In order to appeal, the appellant must submit:

- written appeal which states the grounds for the appeal;
- list of Distance Education Certification Standards, Policies and Procedures pertinent to the contested decision and subsequent appeal; and
- accompanying documentation, including any appended program responses.

ARELLO® will have full access to all other documents and records filed during the initial certification and/or recertification process. The appellant must provide any additional documents or records requested by ARELLO®.

After receiving the written appeal, the ARELLO® CEO will review the appeal and consult with the ARELLO® Distance Education Staff on the decision. The ARELLO® CEO will notify the appellant in writing of the decision of his or her action within thirty (30) days of receiving the appeal.

If the appellant wishes to appeal the decision of the CEO, they may do so by making their final appeal in writing to the ARELLO® Education Certification Committee (ECC) for consideration in a

formal hearing. The ECC is the governing body over the ARELLO® Distance Education Certification Program. The ECC may appoint a subcommittee to review the appeal.

Appeals are administrative, non-judicial, hearings.

During any hearing, the appellant and ARELLO® shall have the following rights:

- To be represented by a representative(s) of their choice
- To be present during any hearing
- To present oral testimony keeping within any established time limits
- If the appellant waives personal appearance, the matter will be heard and decided based on the evidence submitted

The ECC's deliberations following the conclusion of any hearing and its subsequent decision process will be in closed session.

All such appeals may only be heard at a scheduled meeting of the ECC. The full ECC, or subcommittee, may take one of two actions:

- Affirm the decision of the CEO
- Or overturn the decision and vote for other action

In either case, the Chair of the ECC will provide reasons for its actions and notify the appellant in writing within forty-five (45) days following the meeting. If the ECC affirms the prior decision of the ARELLO® CEO, there is no further remedy available to the appellant. The decision of the ECC will be final and binding on all parties.