

PERFORMANCE AUDIT REPORT

Off-Campus Education in Kansas

**A Report to the Legislative Post Audit Committee
By the Legislative Division of Post Audit
State of Kansas
September 1980**

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September 2, 1980

Legislative Division of Post Audit
State of Kansas
Topeka

FOREWORD

This performance audit examines a "growth industry" in higher education--off-campus courses. Within the past few years, off-campus enrollment for community colleges and State universities has grown considerably. On-campus enrollment, on the other hand, has basically stabilized. As the number of high school graduates who come to campus for full-time study continues to decrease, off-campus education promises to become even more important. In a time of potentially dwindling enrollments, the stability of a college or university may depend on finding non-traditional students and teaching them close to where they live and work.

Off-campus courses in Kansas already are attracting a different kind of student. By and large, these students are older, are employed, and take classes part-time. Those who take off-campus courses offered by the universities are usually seeking an advanced degree or improved job skills; those taking courses from community colleges generally do not have a degree and are taking classes for personal development and enrichment.

Like many growth industries, off-campus education has problems associated with its growth. The auditors examined two such problems--duplication of courses and programs by different schools, and unequal quality of off-campus and on-campus courses. The Kansas Legislature has made it clear that State-supported off-campus education should be administered in such a way that duplication is minimized and courses are of equal quality on and off the campus.

In all, 1,969 off-campus courses were offered in Kansas in Spring 1979. Although these courses were offered throughout the State, the greatest markets are in highly populated areas or in places such as military bases that have extensive educational needs. In such locations, the auditors found considerable duplication of courses and programs. These locations included Kansas City, Wichita, Topeka, and Leavenworth. They also found considerable duplication in Southeast Kansas, where there is a large concentration of schools and in an area of Central Kansas. In all, 634 of the 1,969 courses were involved in some kind of duplication.

It is understandable that colleges and universities would want to branch out as much as possible. The continued health of a school, if not its out-and-out survival, may be at stake. To minimize duplication, however, this branching out must be controlled. Much of the current control comes from the Board of Regents, which oversees State universities, and from the Board of Education, which oversees community colleges insofar as State aid is concerned. Each board controls only part of the State-supported schools,

however, and the result has been that two sets of policies have evolved, each largely independent of the other. Coordination and control is not likely to improve significantly under such a system. Within the last few years, for example, the two boards have been unable to agree on a common set of guidelines for off-campus courses. The Legislative Educational Planning Committee directed in 1977 that joint guidelines be developed, but in such important issues as service areas for off-campus instruction and ways to ensure the quality of off-campus courses, the two sides could not agree.

The need seems clear for a single body that can administer clear guidelines and policies for State-supported off-campus education. Unnecessary or unwise proliferation of courses can be costly and can lead to competition that is of little or no benefit to the State's taxpayers. The needed policies include service areas that pertain both to community colleges and to universities, and designated off-campus course locations. Such changes would provide for better coordination of off-campus offerings as well as better cooperation between schools. They would also curb unnecessary proliferation of off-campus locations and would allow for the providing of better services in such matters as library resources and advising of students. The body that oversees off-campus education can also address the problems the auditors found in the quality of off-campus courses, including the lack of support services, lack of evaluation of off-campus faculty by the schools, and lack of contact between many off-campus faculty and their schools.

These changes represent a logical extension of the effort to create a more coordinated system. Understandably, the schools and the State boards are wary of--and perhaps strongly resistant to--such a change in the off-campus program because they have been largely separate in off-campus matters in the past. In Legislative Post Audit's view, however, it is a necessary step if the off-campus program is to be effectively controlled and coordinated. Other states have made the transition and appear satisfied with the results.

This audit provides a comprehensive look at many aspects of the off-campus program. The auditors have developed a comprehensive inventory of off-campus courses, collected information on course costs and revenues, surveyed students and faculty, and examined programs in other states. The cooperation of the Board of Regents, the Board of Education and Department of Education, and all the public and private institutions in Kansas is greatly appreciated. The audit team consisted of Theresia Sculley, the audit supervisor, and her associates Robert Clawson and Vicky West. Assistance was also provided by other members of Legislative Post Audit's staff.


RICHARD E. BROWN
Legislative Post Auditor

Summary of Matters for Legislative Attention

Audit Findings and Conclusions

In recent years, Kansas has experienced a dramatic increase in off-campus education. Between Fall 1978 and Fall 1979, off-campus enrollments increased about 20 percent. On-campus enrollments increased only three percent during that time. The Legislature has been concerned that the off-campus program be administered and coordinated in such a way that duplication is avoided and quality education is provided. As part of that concern, the Legislative Post Audit Committee directed the Legislative Division of Post Audit to conduct a performance audit of the State's off-campus program.

The audit addressed four questions concerning off-campus education:

1. What was the Legislature's intent in allowing Kansas' public colleges and universities to offer off-campus courses, and is this intent being fulfilled?
2. How many off-campus courses are offered in Kansas; which colleges and universities offer them; which students take them; and why do the students take them off campus?
3. What is the extent of duplication of off-campus courses?
4. Are courses offered on and off campus of comparable quality?

Legislative Intent in the Off-Campus Program

The off-campus program is complex. It includes universities controlled by the State Board of Regents, community colleges run by boards of trustees and regulated by the State Department of Education, private colleges and universities, a municipal university, and out-of-State colleges and universities. In all, 43 colleges and universities offered off-campus courses in the State in Spring 1979. Some centralized control and coordination is provided by the Legislative Educational Planning Committee, but in general, the various kinds of institutions operate independently of one another.

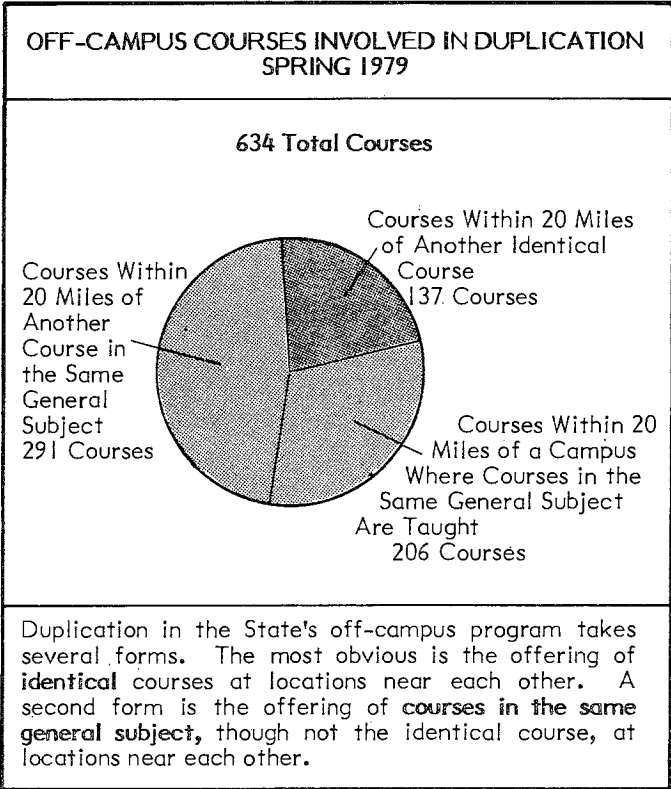
than 15 students. Many of the smallest classes--those with fewer than five students--are courses such as internships, directed readings, or independent study. These courses often have small enrollments on campus as well.

Students who take off-campus courses generally work full time and are older than traditional college students. Students taking courses offered by Regents' institutions differ from those taking community college courses in several respects. Those in university off-campus courses generally have a degree and are working toward another one to improve their careers; those taking community college courses generally do not have a degree and are taking courses for personal development and enrichment.

Duplication of Off-Campus Courses

Duplication in the State's off-campus program exists in several forms. In all, the auditors found that 634 of the 1,969 off-campus courses, or about one-third of the total, were involved in some form of duplication. The forms of duplication were as follows:

1. Of the 634 courses, 137 were duplicating an identical off-campus course taught within 20 miles. (Students indicated that they would be willing to travel 20 miles to take a course.)
2. Other off-campus courses were being offered within 20 miles of a campus that offered courses in the same program area. In all, 206 off-campus courses fit this category. The auditors found that the identical course was often part of the on-campus curriculum.
3. The remaining 291 courses were offered within 20 miles of another off-campus course in the same general subject, though not an identical course. The problem in such cases is that the courses are being offered by different schools, and these schools may not coordinate their courses with each other.



In recent years, the Legislature has expressed concern about the coordination and quality of off-campus courses. Thus far, the Legislative Educational Planning Committee has not been able to get the State Board of Regents and the State Board of Education to agree on specific guidelines for minimizing duplication and controlling the quality of off-campus courses. The guidelines and policies followed by the various institutions are fragmented as a result; a policy that pertains to a community college may be different from the policy that pertains to a State university. These differences hamper effective coordination of the program.

Profile of Off-Campus Instruction in Kansas

The auditors developed a comprehensive list of all off-campus courses taught in Kansas during Spring 1979. In all, 1,969 off-campus courses were offered. (A list of the courses, their locations, and the institutions offering them is available from the Division.) The State's public universities and community colleges offered about 90 percent of these courses. Off-campus courses are offered in almost every subject, but more than three-fourths are in seven major areas--education, fine and applied arts, letters, public affairs and services, business and management, social science, and psychology.

Twenty-one percent of the courses offered are State-supported courses that may be primarily recreational. They are in the areas of physical education, industrial arts, and fine arts, and they include such subjects as physical fitness, woodworking, and weaving. Most of these courses were offered by community colleges. Legislative guidelines state that hobby or recreational courses should not receive State support, but existing definitions are so vague that recreational courses cannot be separated from academic ones. Most of the students surveyed by the auditors said they were taking these courses for personal development, not for careers or degrees. Their responses would indicate that such courses are mainly hobby or recreational. Action is being taken to eliminate State funding for some of these courses, but the vagueness in the definition remains. Further action is necessary.

An analysis of a sample of off-campus courses showed that the tuition, fees, and State and local revenues generated by the courses were more than double the amount needed to pay the direct costs of the instructor's salary, the instructor's travel, and off-campus classroom space. The auditors could not determine the portion of other expenses such as administration, student services, research, and libraries that such courses should be expected to bear. The schools do not make such breakdowns of expenses for their off-campus programs. As a result, it was impossible to determine whether the courses are less expensive to put on than on-campus courses and thus generate extra money that can be used to subsidize more than their share of other expenses.

Off-campus courses vary widely in size. The average class has an enrollment of 13, with more than 65 percent of the classes having fewer

The duplicated courses were concentrated in six main subjects--education, letters, business, social science, fine arts, and psychology. They were also concentrated in six main areas of the State--Kansas City, Wichita, Topeka, Leavenworth, Southeast Kansas, and the Barton/Ellsworth/Rice County area. More than three-fourths of the courses were offered by the Regents' universities and the community colleges.

To reduce duplication, greater State-wide coordination of the off-campus program is needed. At present, the various kinds of institutions set their own policies for offering off-campus courses. The policies of the Regents' institutions, for example, are largely independent of the policies of the community colleges. Changes that need to be made include establishing service areas that pertain both to community colleges and to State universities, developing set locations for offering off-campus courses, and providing a single body with statutory authority to control off-campus offerings for these colleges and universities.

Quality of Off-Campus Courses

The qualifications of on- and off-campus faculty are about the same, but off-campus instructors had considerably less contact with their schools and fewer were evaluated by those schools. Over a third of the off-campus faculty had no significant contact with the home campus. Although most off-campus courses were evaluated by students, they were not evaluated by administrators or by other instructors. The extensive use of part-time faculty, particularly at the community colleges, compounds these problems.

Students perceived differences in the quality of on- and off-campus courses. A survey of students showed that half of the students taking off-campus courses at community colleges thought their off-campus courses were easier than the courses they had taken on campus. (The remainder found them about the same or more demanding.) The Regents' universities fared better; only one-fifth of the students who responded thought their off-campus courses were easier.

Although institutional support such as library resources is likely never to be the same for off-campus and on-campus courses, the current gap appears to be too great. Students and faculty indicate some inadequacies in supplies, equipment and other classroom facilities. Library services are the greatest problem; over half of the faculty report that this area of institutional support is not being adequately met. There is also criticism from students about library services, particularly from university students who take courses requiring substantial library support.

As one would expect, off-campus faculty hold substantially fewer office hours at off-campus locations than instructors hold on campus. Sixty-eight percent of the off-campus faculty surveyed had one hour or less of

out-of-class consultation per week. Seventeen percent of the students indicated that the amount of time for out-of-class consultation was inadequate.

The differences between the quality of on- and off-campus courses are inconsistent with the Legislature's intent. The current State policies that are supposed to control the quality of off-campus courses are insufficient in some cases and ineffective in others. Guidelines in such areas as library services and evaluation of instructors need to be developed.

Audit Recommendations and Agency Responses

The draft audit report was sent to the Board of Regents and Department of Education for review. Through these agencies, it was also made available to all the Regents' universities and community colleges. This procedure is followed in the preparation of all audit reports. It provides the agency an opportunity to point out any errors of fact, to provide additional information, and to respond to the recommendations. The full text of the responses can be found in Appendix D.

The audit's recommendations were in three major categories: improvements in the definition of hobby and recreational courses, actions to reduce duplication of off-campus courses and programs, and actions to help ensure that off-campus courses are of comparable quality with on-campus courses. The following is a list of the recommendations and a summary of the agencies' responses.

Defining Hobby and Recreational Courses

The State Department of Education and State Board of Regents should develop a clear and workable definition of hobby and recreational courses in order to separate courses that should receive State aid from those that should not. The Department and Board should submit the definition to the Legislative Educational Planning Committee for review. By July 1, 1981, the Department and Board should also report to the Committee on the definition's impact, if any, on State funding for such courses.

Agency responses. Both the Department of Education and the Board of Regents said they would cooperate in developing a clear definition of hobby and recreational courses, but neither one appeared to recognize much of a need for such a definition. The Board of Regents pointed out, as did the audit report, that few courses offered by Regents' universities fall into this category. The Department of Education said its opinion was that if a course other than a physical education course taught outside the district is approved and applies to an educational program, State aid should be given. This is basically the current policy.

Reducing Duplication in Off-Campus Courses and Programs

To increase efficiency in the offering of off-campus courses and to reduce duplication of courses and programs, the following steps should be taken:

1. The Legislature should establish statutory policies and guidelines for controlling the off-campus program. The statutory policies and guidelines should include the following:
 - a. Regional service areas. Regional service areas that will apply to all public postsecondary institutions should be required. Decisions on service areas should be based on the following statutory criteria:
 - size of the student population
 - size of the geographic area
 - number and location of postsecondary institutions
 - ability of the institutions to provide full academic degree programs
 - ability of the institutions to provide support services such as library resources, advising, and the like.
 - b. Locations for off-campus courses. Within regional service areas, set locations should be developed at which off-campus courses may be offered. Decisions on these locations should be based on the statutory criteria set forth above.
 - c. Restrictions on offering courses close to campus. Public postsecondary institutions should be restricted from offering off-campus courses within 20 miles of their home campus.
 - d. Control of out-of-State institutions. K.S.A. 1979 Supp. 74-3251 should be amended to require State approval of courses offered by out-of-State schools. At present, schools are required to register such courses but not to have them approved.
2. The Legislature should place statutory authority for implementing these policies and guidelines, approving exceptions to them, and generally controlling off-campus education in one of the following bodies:

- a. The Legislative Educational Planning Committee. To allow the Committee to perform such an executive functions, membership would have to be expanded to include representatives of the executive branch or the general public, and only these other members could be involved in many of the specific decisions about the off-campus program.
 - b. A new body comprised of representatives of the colleges and universities, the Board of Regents and Board of Education, and the general public.
 - c. The Board of Regents.
3. In handling its responsibilities for controlling off-campus education, the designated body should attempt to limit the number of off-campus course locations to one per county, approving more only if special circumstances (such as a high concentration of population) would call for them. The body should require all out-of-State institutions to comply with its policies and should encourage private colleges and universities in the State to do so as well.

Agency responses. The first of these recommendations covers statutory policies and guidelines that should be established over certain aspects of off-campus education. The agencies' response to the various policies was as follows:

Regional service areas. The Board of Regents and Department of Education both noted that service areas already existed for their respective schools, but neither agency commented directly on the audit's recommendation that service areas pertaining both to community colleges and to State universities be established. In Legislative Post Audit's view, such combined service areas are necessary to eliminate unnecessary duplication of courses and programs.

Specified off-campus locations. The Board of Regents noted that its institutions were generally meeting the standard of one location per county suggested in the report, but it said the number was not high enough for highly populated areas. (The recommendations acknowledge that more locations may be needed in highly populated areas.) The Department of Education disagreed that such a standard should be established at all. Neither agency commented on the recommendation's intent that university and community college courses be offered at the same location. In Legislative Post Audit's view, combined locations

would make off-campus offerings more visible, more fully coordinated, and more likely to have adequate services such as library support.

Restrictions on offering courses close to campus. Both the Board of Regents and the Department of Education said there were legitimate exceptions to a policy prohibiting off-campus courses from being taught within 20 miles of a campus. The Board pointed out, for example, that a course taught for a specific school district should be taught at the location. Legislative Post Audit agrees that there are legitimate exceptions to such a policy. Under the recommendations, the body designated to put these policies and guidelines into effect would evaluate such cases and approve the exceptions. Reasons for making such exceptions would include the availability of specialized resources (hospital facilities, for example) at the off-campus location, or the specialized nature of the course (such as a course for employees of a single hospital or school district). The auditors found many cases in which such reasons were absent.

Control of out-of-State institutions. The Board of Regents responded that it would not object to such a change but thought that the existing policy and practices were sufficient.

The second recommendation covers the placing of responsibility for implementing the policies and guidelines with a single body. The Board of Regents noted that this recommendation was addressed to the Legislature and did not indicate whether it agreed or disagreed with it. The Department of Education disagreed, stating that "there is an inherent danger in placing off campus programs in a class, a category by itself, and governing them by a different set of standards or a different agency." Legislative Post Audit acknowledges that the potential for conflict exists. This potential would need to be kept in mind as the role of the off-campus board was developed. Legislative Post Audit believes, however, that the conflicts which could result are certainly manageable in comparison to the alternative of taking no action and allowing existing problems to continue. Other states have made the transition and appear satisfied with the results.

The agencies did not comment on the third recommendation except to state their reservations about a disagreement with the suggested standard of one off-campus location per county for counties without high concentrations of people.

Helping to Ensure that On- and Off-Campus Courses are of Comparable Quality

To help meet the Legislature's intent that off-campus instruction be of comparable quality to on-campus instruction, the following actions should be taken:

1. The body designated by the Legislature to control off-campus education in Kansas should develop a detailed set of guidelines to control more carefully the quality of all off-campus courses. The guidelines should include, but not be limited to, the following:
 - a. A procedure to determine that every off-campus location has library services, counseling and advisement, and scheduled office hours for instructors.
 - b. Evaluations of all off-campus courses each semester, both by students and the school. An assessment of the comparability of coursework and grading standards to similar courses on campus should be included in the school's evaluation.
 - c. A procedure to determine the comparability of campus contact between off-campus faculty and similar on-campus faculty. Included in the determination should be the number of on-campus faculty meetings and relevant department meetings attended by off-campus faculty and the amount of participation in program planning and development.
2. Through the course approval process of the State Board of Education and the budget approval process of the State Board of Regents, any off-campus course failing to comply with the guidelines should be denied approval for State funding.

Agency response. The Board of Regents and Department of Education agreed that the basic areas addressed in these recommendations--support services, evaluation of instructors, and comparability of campus contact between on- and off-campus faculty--should be acted on. The Board of Regents said it supported the recommendations in these three areas. As with the previous set of recommendations, the Board did not address the issue of a single body's direction in these areas for State universities and community colleges together. The Department of Education said it would be willing to study these areas on its own for the community colleges and report its findings to the Legislative Educational Planning Committee in 1981.

Matters Remaining for Legislative Attention

Several of the report's recommendations are directed to the Legislature. They call for the Legislature to consider whether certain policies and guidelines about off-campus education should be written into law and whether control over significant aspects of off-campus education should be placed in a single agency, committee, or board.

The remaining recommendations also need to be addressed by the Legislative Post Audit Committee and the Legislature. The Board of Regents and Department of Education do not appear to be ready, on their own, to bring about changes in the current policies regarding hobby and recreational courses. Specific legislative direction in that area may be needed. The Board and Department appear to be more supportive of the recommendations dealing with the quality of off-campus courses, but action in these areas depends in part on whether a single agency or board is to be responsible for the actions called for in the recommendations.

In Legislative Post Audit's view, the Legislative Post Audit Committee should proceed with formal consideration of all the recommendations in the report or should refer the report to some other legislative committee for further action.

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CHAPTER I

INTRODUCTION

Off-campus education has been available in the State since 1890, but only in recent years has Kansas experienced a dramatic increase in the program. In just one year, from Fall 1978 to Fall 1979, off-campus enrollments increased about 20 percent, from 13,742 to 16,352 students. On-campus enrollments increased only three percent during the same time. Some of the growth in the off-campus program can be explained by a national trend to make postsecondary education easier to obtain. The growth can also be explained, in part, by the increase in State financial support.

Throughout the development of off-campus education, the Legislature has consistently sought to establish a coordinated program that avoids duplication and that provides quality education. The rapid increase in off-campus offerings and the problems in coordinating them put the achievement of this goal in doubt. As a result, the Legislative Post Audit Committee directed the Legislative Division of Post Audit to conduct a performance audit of the State's off-campus program. The audit was conducted under the Legislative Post Audit Act, which provides for performance audits of a program's effectiveness and efficiency as the basis for recommendations to improve it.

Audit Objectives and Methods

The audit addressed four questions concerning off-campus education:

1. What was the Legislature's intent in allowing Kansas' public colleges and universities to offer off-campus courses, and is this intent being fulfilled?
2. How many off-campus courses are offered in Kansas; which colleges and universities offer them; which students take them; and why do the students take them off campus?
3. What is the extent of duplication of off-campus courses?
4. Are courses offered on and off campus of comparable quality?

To answer the question of legislative intent, the auditors reviewed State laws and regulations, legislative committee minutes, agency policies

and procedures, and various task force studies. For the second question, which dealt with various characteristics of off-campus courses, a comprehensive inventory of courses was needed. No single listing existed of off-campus courses being taught in the State, so the auditors developed one. They used course listings provided by the State Board of Regents, the State Board of Education, and the Associated Independent Colleges of Kansas, and they also sent questionnaires to 46 Kansas postsecondary institutions and to 10 out-of-state institutions. In all, they found that 1,969 off-campus academic courses were offered in the Spring 1979 semester. (Vocational courses were excluded from the inventory.)

The off-campus course inventory was used to answer the third question--the extent to which courses duplicated each other. To identify attempts to minimize duplication, the auditors reviewed the policies and procedures of the various public and private colleges and universities participating in the off-campus program. They also reviewed the off-campus education policies and procedures of various supervisory agencies, boards, and committees--the State Board of Regents, the State Board of Education, the Associated Independent Colleges of Kansas, and the Legislative Educational Planning Committee.

Finally, to help complete the picture of Kansas' off-campus program, and to determine whether the off-campus courses being offered in Kansas are comparable in quality to on-campus courses, the auditors surveyed approximately 400 off-campus students and 300 faculty by mail. The students and off-campus faculty were selected at random from the off-campus course inventory. Whenever the auditors found an off-campus course that was also taught on campus, the on-campus faculty member was included in the survey. In the surveys, the auditors asked questions about the adequacy of off-campus facilities, the content of the off-campus courses, and the amount of contact between faculty and students in off-campus courses. They also asked about the credentials of the on- and off-campus faculty and the amount of contact off-campus faculty had with the home institution.

Organization of the Audit Report

Chapter II of the audit addresses the Legislature's intent in allowing Kansas postsecondary institutions to offer courses off campus. It also describes the organization of the Kansas postsecondary education system and the financing for off-campus courses. Chapter III provides a profile of the off-campus program, noting the type and number of courses that are taught and the type and number of students taking them. Chapter IV analyzes the extent to which duplication is occurring in the offering of off-campus courses and the reasons for its occurrence. Chapter V examines the quality of off-campus courses in comparison to on-campus courses.

CHAPTER II

DEVELOPMENT OF OFF-CAMPUS INSTRUCTION

Increase in Off-Campus Instruction

Off-campus education in Kansas has grown haphazardly, and there is little historical information to trace its development. From the early 1900s through the 1960s, it appears to have played a minor role in postsecondary education. In those years, postsecondary education as a whole was expanding. Additional four-year institutions were being established, community colleges were created, and education began to encompass such areas as vocational training and community service.

As colleges and universities grew in numbers and became more sophisticated in the services they could provide, they began to take education off the campus and out to the community. A variety of institutions became involved in this movement and, until recent years, operated independently of one another. These institutions include the following:

1. **The Board of Regents' universities.** The six State universities are under the supervision of the State Board of Regents.
2. **The community colleges.** These 19 schools are regulated by the State Board of Education.
3. **Washburn University of Topeka.** Washburn University is a municipally owned four-year institution.
4. **Private colleges and universities.** Although not as active in off-campus education as the public colleges and universities, the private schools do offer off-campus courses. These schools all have their own governing boards.
5. **Out-of-State colleges and universities.** Several out-of-State schools offer off-campus courses in Kansas. Except for registering with the State Board of Regents, the out-of-State schools operate programs at their own discretion.

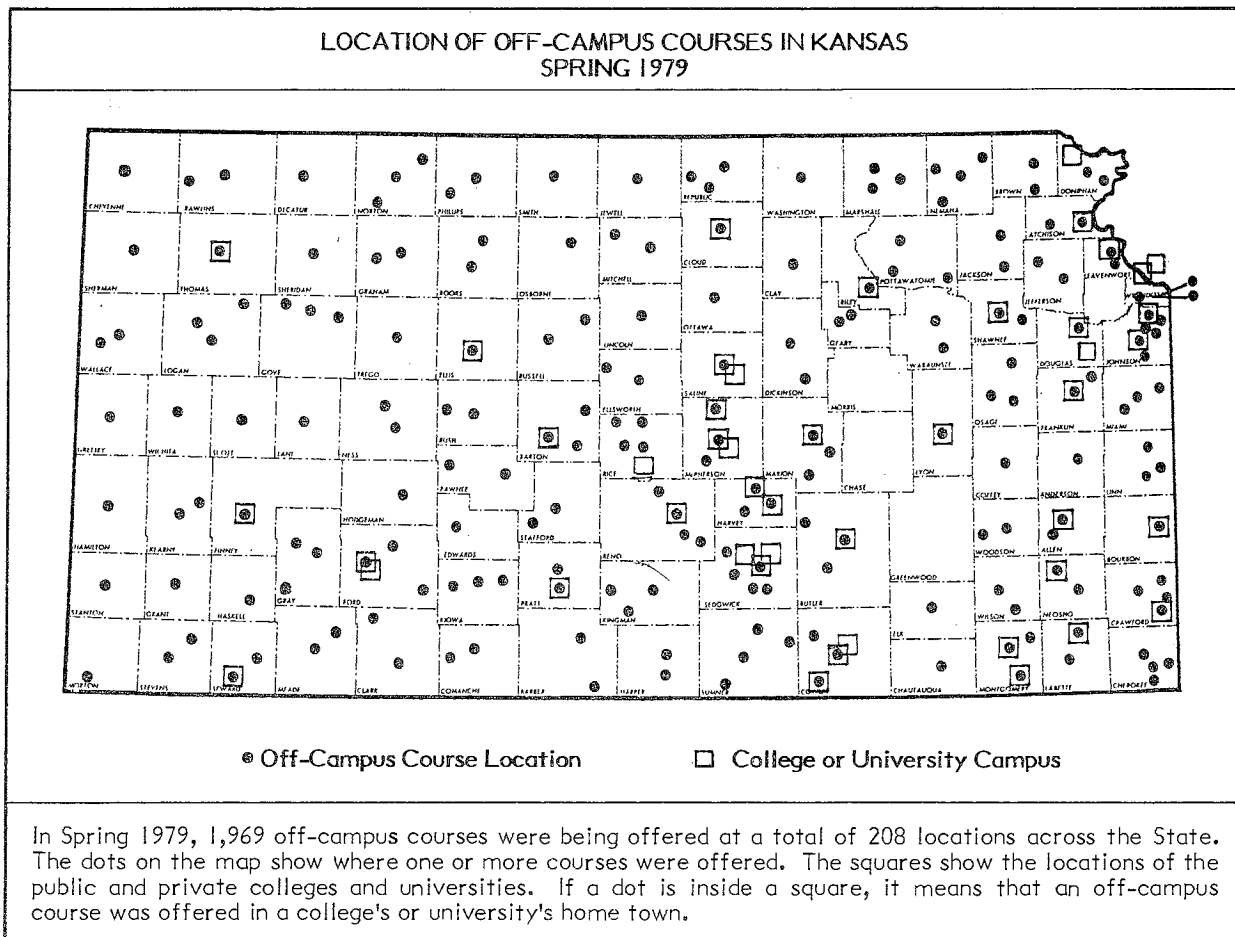
Very little historical enrollment information is available for these institutions and their off-campus activities. What is available shows that

the off-campus full-time equivalent enrollment at Regents' universities grew from 1,344 in Fall 1974 to 3,124 in Fall 1979, a 132 percent increase. Information available for the community colleges shows that the credit hours generated in off-campus courses increased from 2,320 in fiscal year 1973 to 52,618 in fiscal year 1980. This is a 2,168 percent increase over a seven-year period.

As the map below shows, the increase in the off-campus program has made off-campus courses available across the entire State. In Spring 1979, 1,969 off-campus courses were offered at 208 locations. There were 43 public and private institutions offering these courses, including 10 out-of-State institutions.

Legislative Intent for Teaching Off Campus

There is little intent directed specifically at off-campus instruction until the mid 1970s. Until that time, much of the intent for offering courses



off-campus must be inferred from the intent for postsecondary education found in the State Constitution and statutes and from the Legislature's decisions about funding for off-campus instruction.

Intent in the Constitution and Statutes

The constitutional provisions dealing with education are found in Article Six of the Kansas Constitution. A broad mandate is given to the Legislature to provide for intellectual, educational, vocational, and scientific improvement by establishing public schools, educational institutions, and related activities. The State Board of Regents and the State Board of Education are also constitutionally established and are given general supervisory authority over educational institutions and all the educational interests of the State.

Although the State Board of Regents has no direct authority to allow off-campus instruction, K.S.A. 76-712 does give it authority to make contracts and adopt orders, policies, and rules and regulations that are appropriate for the control, operation, and management of Regents' universities. As part of its administrative authority, the Board has permitted the universities to offer courses off campus. The State Board of Education has a similar set of powers with regard to the community colleges (K.S.A. 1979 Supp. 72-7513). In addition, the board of trustees for each community college is allowed by law to set the educational program for its particular institution. Such decisions by the State Board of Education and the boards of trustees have included the offering of off-campus courses.

Intent in State Funding

The Legislature's endorsement of off-campus education is more clearly shown in its funding decisions. State funding for the community colleges in the form of credit hour aid began in 1961. Since that time, the statutory definition of "credit hour" has never differentiated between courses taught on or off campus and has always been interpreted to include off-campus courses. In 1965, counties that had no community college but that did have students attending community colleges in other counties began to pay a fee to those counties. This fee was to help offset the costs the counties were incurring to educate students who were not residents. The fee included both on- and off-campus courses. When the State began paying a portion of the fee in 1974, direct reference was made in the statute to off-campus courses in that the State Board of Education was required to approve their location. This action not only gave tacit approval to the offering of off-campus courses, but it also provided for greater State control over them.

In 1973, the authority of community colleges to offer off-campus courses was addressed in Attorney General Opinion 73-310. The Opinion

concluded, "Rather than prohibiting off-campus instruction, the Legislature recognized it as within the authority of community junior colleges and chose to provide administrative controls over such offerings through the withholding of State aid for such offerings as were not approved by the State Board of Education." During the 1977 legislative session, House Bill 2527 was introduced by the Committee on Education on special request. The bill would have eliminated all State aid to courses outside the district of the community college--the courses which are considered as "off campus" for the community college. Passage of the bill would have been a clear indication of the Legislature's intent not to support off-campus education. However, the bill was never reported out of the Education Committee.

The Legislature has also provided funding for off-campus instruction at the Regents' universities. Before fiscal year 1976, the Regents' universities financed off-campus courses primarily from student fees. They were not allowed to include the credit hours generated by off-campus courses in their appropriation requests. In the fiscal year 1976 appropriation, the Legislature approved State funding for off-campus credit hours at the same rate as on-campus credit hours, provided that the course was taught by a regular faculty member as part of his or her normal teaching load.

Legislative Directive for Cooperation

Although the Legislature has clearly approved of offering courses off campus, it has not always approved of how they are offered. This became evident in the work of the Legislative Educational Planning Committee. The Committee was created in 1974 and comprises six members of the House of Representatives and five members of the Senate, all appointed by the Legislative Coordinating Council. This Committee was directed to plan for public and private postsecondary education in the State. In its planning efforts, the Committee was to establish educational goals and a schedule to put those goals into effect. It was also directed to report its actions annually to the Legislature and Governor. In April 1974, the Governor, under amendments to Section 1202 of the federal Higher Education Act, designated the Legislative Educational Planning Committee as the 1202 Commission for Kansas. As a 1202 Commission, the Committee's responsibilities were expanded to include the type of planning which would ensure that educational resources were coordinated.

In 1975, as part of its first annual report, the Committee noted the increase in off-campus offerings in recent years and predicted that the growth would continue. It concluded, "There appears to be an absence of coordination in this area of educational activity among competing types of institutions. Serious attention should be devoted to an analysis of the totality of continuing education opportunities available throughout the state and to establishment of some means to better coordinate these programs." To establish coordination, the Committee in 1976 passed a resolution requesting and encouraging cooperation between the State Board of Regents

and the State Board of Education in planning postsecondary education, particularly off campus. It cited the need to avoid such problems as the duplication of programs and courses.

The Committee again called for cooperation in 1977 when it became concerned that a proliferation of off-campus courses was occurring because of additional funding such courses were receiving, coupled with stable or decreasing on-campus enrollments. It was also concerned that this proliferation might be occurring without regard to the quality of the courses or the resulting competition among institutions. The Committee heard testimony from the State Board of Regents, the State Board of Education, and the Associated Independent Colleges of Kansas as to the extent of their cooperation in offering off-campus courses. The conferees indicated that they all followed voluntary guidelines as to the location of courses and that they took steps to ensure the quality of their off-campus offerings.

During its review, the Committee decided that formal rather than voluntary guidelines were needed to direct the development of all postsecondary off-campus offerings. The Committee directed representatives of the three sectors of postsecondary education--the Regents' institutions, the community colleges, and the private colleges and universities--to develop joint guidelines for offering off-campus courses. These guidelines would then become part of a State plan for postsecondary education. Within the guidelines, the role of the private colleges and universities, the quality of instruction, and the determination of service areas were to be addressed.

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Disagreement on Guidelines

The Legislative Educational Planning Committee's directive for joint guidelines in effect asked the three groups to give up some of their

MAJOR DEVELOPMENTS IN ESTABLISHING OFF-CAMPUS EDUCATION GUIDELINES	
1974	Postsecondary Educational Planning Instituted Legislative Educational Planning Committee is created to plan and coordinate postsecondary education.
1975	Need for Cooperation Identified The absence of coordination in offering off-campus courses is identified by the Committee.
1976	Cooperation Among Institutions Requested The Committee passes a resolution requesting the State Board of Education and the State Board of Regents to cooperate in their off-campus efforts.
1977	Development of Off-Campus Guidelines The Committee requests the postsecondary institutions to develop one set of formal off-campus guidelines.
1978	Statement of Principles Adopted Agreement could not be reached on the off-campus guidelines. The Committee adopts a general statement of principles on which the institutions do agree.

independence to achieve the cooperation the Committee felt was necessary to avoid such problems as duplication and lack of quality in off-campus courses. The guidelines were to be formal statements of policy rather than a voluntary arrangement among the institutions. The events which took place during the summer and fall of 1977 demonstrated, however, the difficulty of achieving this goal.

Staff of the State Board of Education, the State Board of Regents, and the Associated Independent Colleges of Kansas met on several occasions and developed a set of guidelines. Along with a statement of general principles and missions of the schools, the guidelines stated the following regarding undergraduate courses:

- Private colleges and universities should be dealt with separately because they were not public institutions and did not have a single governing board.
- In deciding where to locate off-campus courses, the only areas in which the public institutions needed to coordinate with the private institutions were in the private institutions' home towns. The only areas in which the public institutions needed to coordinate with one another were in the public institutions' home counties. This arrangement would not apply to courses the community colleges and the Regents' universities were teaching for State and federal agencies, on military bases, or at the penal institutions.
- Courses taught off campus should be of high quality and "personal interest courses, hobby courses, and recreational courses usually will not be offered off the campus for academic credit and shall not be eligible for State general fund support."
- Qualified faculty should teach off-campus courses. For the community colleges, qualified off-campus faculty were to be chosen based on the education, training, and professional competence in the subject area to be taught, any teaching or comparable experience, and evaluation by the parent institution. Regents' university off-campus faculty were to be regular faculty who taught the course as part of their regular workload. Such faculty members thus could only teach courses off campus in the discipline they were teaching on campus. They were also to have taught the course on campus at least once in the past two years. Courses taught by Regents' faculty who did not meet these requirements would not be eligible for State support.

These guidelines were taken by the staff to the respective boards for approval. The Board of Education approved the guidelines, as did all but one of the governing boards for the private colleges and universities. The Board of Regents, however, took issue with two points in the guidelines. Specific-

ally, the Board of Regents disagreed on the service areas of the community colleges and the Regents' universities and on the qualifications of off-campus instructors. The Board of Regents proposed that university service areas be a 20-mile radius around the university rather than the county in which it is located, with no exceptions for military installations and penitentiaries. With regard to the qualifications of off-campus faculty, the Board proposed that all off-campus credit courses should be taught by regular faculty as part of their assigned responsibilities. With the exception of these two areas, the Board of Regents' guidelines were similar to those agreed to by the Associated Independent Colleges and the Board of Education.

Compromise on Guidelines

Because these differences could not be resolved, the three groups were unable to meet the Legislative Educational Planning Committee's directive to submit joint guidelines. Instead, the Associated Colleges and the Board of Education submitted one set of guidelines and the Board of Regents submitted another. These two sets of guidelines were presented to the Committee at its October meeting, at which time Washburn University pointed out that it had not participated in the development of the guidelines. The Committee delayed further action for a month, and in November 1977, it reviewed the two sets of guidelines containing amendments to include Washburn University. In an attempt to develop a workable arrangement among institutions offering off-campus courses, the Committee adopted those guidelines on which there was agreement. These guidelines included the statement of general principles and the missions of the institutions, which stated the following:

- Communication and cooperation should be maximized.
- A coordinated program to avoid duplication should be offered.
- The opportunity for quality instruction and learning environments should be maximized.
- Access to appropriate supportive resources for undergraduate courses should be provided.
- The community colleges should be primarily responsible for the citizens in their county, the independent institutions should be primarily responsible for their particular constituencies, and the Regents' universities should be primarily responsible to the citizens of the State.
- Credit courses should be of high quality. Personal interest, hobby and recreational courses will not be offered for credit, nor will they receive State support.

These guidelines are still in effect. Because they are general, specific implementation has been left to the institutions and their governing boards. Also, the guidelines do not address the issue of service areas or qualifica-

tions of off-campus faculty, the two main areas of disagreement among the postsecondary institutions. These issues have not been resolved.

Service Area Proviso

During the 1980 legislative session, a proviso dealing with Regents' university service areas was included in the State Board of Regents' fiscal year 1981 appropriation. The proviso linked State funding of off-campus courses to service areas for the universities. In June 1980, service areas were established. Although this action does not resolve the service area disagreement between the Board of Regents and the Board of Education, it does establish a geographic off-campus service area for each of the Regents' universities. The Board of Regents based the service areas for the universities on the proximity of the nearest Regents' university and the characteristics of the geographic areas to be served. Three service areas were set out, with two Regents' universities serving each area. Beginning in Spring 1981, any off-campus course taught in another service area will be State-supported only if the Board of Regents has determined that the universities with jurisdiction in the area cannot offer the course. The Regents' university service areas as established by the Board are shown in Appendix A. Service areas for the community colleges, which were established by the Department of Education and are not related to the universities' service areas, are shown in Appendix B.

Present Organization of the Off-Campus Program

As its development shows, the present off-campus program includes a variety of institutions and groups. The accompanying figure shows the groups involved and the roles they play. Five different types of postsecondary institutions are now offering academic off-campus courses--Regents' universities, community colleges, private colleges and universities, a municipal university, and out-of-state institutions. Of the 56 postsecondary institutions in the State in Spring 1979, 43 of them were offering courses off their main campus. Ten of the institutions offering off-campus courses were out-of-state schools. The 13 institutions not offering off-campus were all Kansas private colleges or universities.

Regulation and Coordination

The State regulates, to varying degrees, three of the five types of institutions offering off-campus courses. The Regents' universities are regulated through the State Board of Regents. An Extension Officer on the Board's staff reviews and coordinates the offering of off-campus courses. Each Regents' university must receive approval from the Extension Officer to teach a course off campus. Through the State Board of Regents, the

State also monitors courses taught by out-of-state institutions. Out-of-state institutions are required to register courses with the Board of Regents before the courses are offered in Kansas. The Board registers these courses but does not approve or disapprove them. The institutions must include such information as course level and credit hours for each course. Courses not registered with the Board are prohibited from being offered.

KANSAS OFF-CAMPUS EDUCATION PROGRAM					
These institutions of higher education can offer off-campus courses . . .	6 Board of Regents' universities	19 Community colleges	20 Private institutions	1 Municipal university (Washburn)	10 Out-of-State institutions
Some are regulated by the State in their offering of off-campus courses, some are not . . .	Regulated by State Board of Regents	Regulated by State Board of Education	No State regulation	No State regulation	Monitored by State Board of Regents
Some institutions also have governing boards which control their offering of off-campus courses . . .	No additional boards	Board of Trustees for each community college	Board of Trustees for each private institution	Washburn Board of Regents	Out-of-state public and private governing boards
The institutions are coordinated by and receive advice from different groups . . .	Legislative Educational Planning Committee Kansas Council for Community Service and Continuing Education	Legislative Educational Planning Committee Kansas Council for Community Service and Continuing Education	Legislative Educational Planning Committee Kansas Council for Community Service and Continuing Education The Associated Colleges of Kansas	Legislative Educational Planning Committee Kansas Council for Community Service and Continuing Education	Legislative Educational Planning Committee through the State Board of Regents
Financing for off-campus courses is provided from a variety of sources . . .	State Legislature Student Tuition	Community college district State Legislature Student tuition	Private Sponsors Student tuition	City of Topeka State Legislature Student Tuition	Out-of-state public and private sponsors Student tuition
<p>The off-campus program is complex. Fifty-six institutions are involved; 35 of them are regulated by the State. Some institutions also have governing boards which control the offering of off-campus courses. The Legislative Educational Planning Committee provides State-wide coordination, and some institutions receive additional guidance from advisory groups. Financing is provided from a number of sources.</p>					

The State Board of Education, and its administrative staff in the Department of Education, is responsible for State regulation of the community colleges. The Department's postsecondary education section approves the location of off-campus courses and determines which courses are eligible for State aid. The financial division handles the actual computation of State aid to the community colleges and also audits the schools. The community colleges, in addition, each have a board of trustees that also controls the offering of off-campus courses.

The remaining two types of institutions are not directly regulated by the State. Washburn University is regulated by its own Board of Regents, which includes a member of the State Board of Regents and four members appointed by the Topeka Board of Education. In addition, Washburn's Board of Regents includes the mayor of Topeka and members of the City Commission. The private institutions are each governed by a board of trustees.

Along with the State and local regulation of off-campus instruction, there are also groups that coordinate and advise in the offering of off-campus courses. The Legislative Educational Planning Committee is the only State-wide coordinating body established by statute. The Kansas Council for Community Service and Continuing Education, created in 1973, has members from all postsecondary sectors and, on a voluntary basis, coordinates continuing education programs. The Council meets annually and makes recommendations to its members concerning the coordination of off-campus offerings. Cooperation among member institutions is encouraged. Agreement or approval before offering courses off-campus is not required, however. This cooperative arrangement is set out in guidelines adopted by the Council. The community colleges also have an advisory council and an association involved with the offering of courses. The private institutions, in turn, have an association that acts in an advisory and planning capacity.

Off-Campus Funding

Off-campus courses offered by the Kansas postsecondary institutions are funded in the same way as on-campus courses. The sources of funds vary by type of institution. Each, however, receives both lump-sum and credit-hour based funds:

<u>Type of Institution</u>	<u>Lump-Sum Revenue Sources</u>	<u>Credit-Hour Revenue Sources</u>
Regents' Universities	State General Fund	Student Tuition
Community Colleges	County Property Tax	Credit-Hour State Aid Outdistrict State Aid County Outdistrict Aid Student Tuition

<u>Type of Institution</u>	<u>Lump-Sum Revenue Sources</u>	<u>Credit Hour Revenue Sources</u>
Washburn University	City Property Tax	Credit-Hour State Aid Student Tuition
Private Colleges and Universities	Private Foundation or Church Support	Student Tuition

The Regents' universities, whose mission is to provide statewide educational opportunities, have two primary sources of funding: the State General Fund and student tuition. State general fund support is based generally on increases or decreases in enrollment. When enrollments increase, funding is provided for additional classified and unclassified positions and for additional operating expenses. The Legislature has set varying funding rates for the universities in these three categories to account for differences in the size and activities of the universities.

The community colleges' mission is to serve the county which comprises their district. They are funded partially by their home county and partially by the State. Community colleges have four major sources of funding: State aid, county out-district aid, local property tax, and student tuition and fees. All but the local property tax support is paid on a credit-hour basis. The amount of State credit-hour aid received by the community colleges is based on a complex system. It is dependent on the community college student and his residence, the number of credit hours he has earned previously, and the types of courses he is enrolled in. If the student lives within the community college district, he will not generate any outdistrict State aid. In Spring 1979, if he had over 64 credit hours, he would generate less aid per credit hour than if he had fewer than 64 credit hours. Also, the credit hours the community college student generates receive credit-hour aid at different rates depending on whether they are academic or vocational in nature. This is to account for differences in operating the two types of programs. In the 1980 legislative session, the restrictions regarding the number of credit hours a student had previously earned were removed. Now all academic credit hours generate the same amount of State aid. That amount was raised during the session to \$22.50 for each credit hour.

As a municipal university, Washburn University receives some State money. Its service area is primarily Topeka, but it also serves some people statewide. The State has chosen to provide State funding using the same credit-hour rate as that for the community colleges.

Private colleges and universities serve their own constituencies and are funded by them. The institutions themselves receive no State money. Their students, however, can receive State tuition grants and State scholarships.

Conclusion

Although it has never given direct statutory authority for offering courses off campus, the Legislature has given broad governing authority to the State Board of Education and the State Board of Regents. These Boards, in turn, have made decisions to offer off-campus courses. The Legislature, through various funding decisions, has tacitly approved of such offerings.

In recent years, the Legislature has expressed concern about the coordination and quality of off-campus courses. Thus far, the Legislative Educational Planning Committee has not been able to get the State Board of Regents and the State Board of Education to agree on specific guidelines for minimizing duplication and controlling the quality of off-campus courses. It has adopted statements of general principle calling for the avoidance of duplication and maintenance of quality. Development of specific guidelines for putting these cooperative principles into effect has been left to the postsecondary institutions and their governing boards.

The guidelines and policies for off-campus education followed by the various postsecondary institutions thus remain fragmented. Most important among the remaining issues are the divergent opinions on the service areas for off-campus instruction and differences on ensuring the quality of off-campus courses. These issues have not been resolved.

CHAPTER III

PROFILE OF OFF-CAMPUS INSTRUCTION IN KANSAS

To determine what the off-campus program actually looks like, Legislative Post Audit developed an off-campus course inventory for Spring 1979. Information already collected at the State level was used as a start for the inventory. Additional information was collected from all the postsecondary institutions involved in off-campus education and from students who took the classes. This chapter summarizes Legislative Post Audit's findings.

Defining an Off-Campus Course

To determine which institutions offered off-campus courses, several inconsistencies had to be resolved in how off-campus instruction is defined. At the various colleges and universities, off-campus instruction is known by a variety of names, including continuing education, extension education, and community service. An off-campus course can be academic, vocational, or recreational. It can be taught for college credit or for no credit.

Colleges and universities differ in the courses they consider as off-campus. For example, courses taught by an institution in its home town, but in a facility not on its main campus, may or may not be called off-campus. If the institution owns the facility, it may consider it to be part of its main campus. If the institution rents a facility next to its main campus, it may or may not consider it to be a part of its campus. In addition, there are courses which meet on campus for part of their coursework and off campus for the remainder. Student teaching is an example of such a course. This type of course may or may not be considered off-campus, depending on the school.

Community colleges present yet another difficulty in defining off-campus courses. Because of differing funding methods, community colleges have two different designations for courses taught off their campus. Courses taught off the main campus but within a community college's district are considered extension courses. Courses taught outside a community college's district are referred to as outdistrict courses.

To cut through these inconsistencies, Legislative Post Audit developed a definition of an off-campus course: **any academic course taught for credit**

off the main, contiguous campus of the postsecondary institution and in which no on-campus coursework was required. Vocational courses were excluded.

Using this definition of an off-campus course, auditors compiled an inventory of off-campus courses taught in the Spring 1979 semester. Thirty-three of the 46 postsecondary institutions in Kansas were teaching off their main campus in that semester. Ten out-of-State institutions were also teaching in Kansas. The accompanying table shows the institutions teaching off-campus and the number of off-campus courses taught by each type of institution.

In all, 1,969 courses were being offered off campus in Spring 1979. The number being taught by any one institution ranged from as few as one to as many as 231. Of the 1,969 off-campus courses, 1,757, or 89 percent, were taught by the public institutions. The Regents' universities and the community colleges were about equally divided, with the community colleges teaching 930 courses, or 47 percent of all off-campus courses, and the universities teaching 827, or 42 percent. The Regents' universities averaged 138 off-campus courses per university while the community colleges averaged 49 courses each. The remaining public institution, Washburn University, taught 13 courses off-campus.

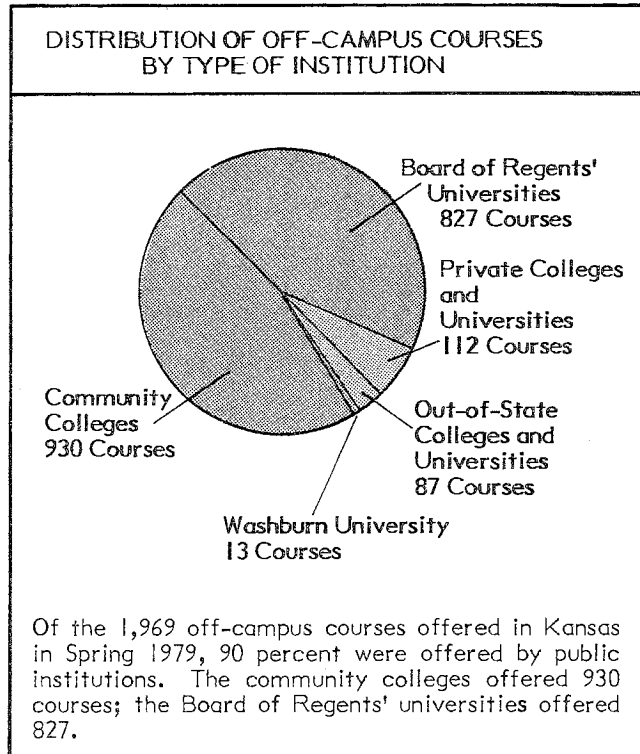
Only seven of the 20 private colleges and universities were offering courses off their main campus. They taught 112 courses, accounting for six

POSTSECONDARY INSTITUTIONS TEACHING OFF-CAMPUS IN KANSAS SPRING 1979							
Type of institution	Number of Institutions	No. Teaching Off-Campus		Courses Taught Off-Campus		Number of Off-Campus Courses	
		No.	Percent	No.	Percent	Range	Average
Regents' Universities	6	6	100%	827	42%	51-231	138
Community Colleges (a)	19	19	100%	930	47%	11-127	49
Washburn University	1	1	100%	13	1%	NA	NA
Private Colleges or Universities	20	7	35%	112	6%	10-35	16
Out-of-State Colleges or Universities	<u>10</u>	<u>10</u>	<u>NA</u>	<u>87</u>	<u>4%</u>	<u>1-28</u>	<u>9</u>
TOTAL	<u>56</u>	<u>43</u>	77%	<u>1,969</u>	<u>100%</u>	1-231	46

(a) A total of 253, or 27 percent of these courses, are indistrict courses--that is, courses within a college's home county. Because the community colleges do not consider courses taught within their districts as off-campus, they do not generally include these courses in their own off-campus course totals.

percent of the total, and averaged 16 courses per institution. In addition, ten out-of-state colleges and universities were offering courses in Kansas. The 87 courses taught by these institutions were four percent of the total off-campus courses. They averaged nine courses per institution.

The list of courses, their locations, and the institutions offering them was too large to be included in this report. Legislative Post Audit has such a list in a supplemental volume to this report, however, and it is available on request.



Types of Off-Campus Courses

Using the off-campus inventory, auditors were able to determine the kinds of programs in which courses were being offered. The postsecondary institutions were asked to classify the various courses they taught off campus in Spring 1979, using the Higher Education General Information Survey classification. This classification is organized into 30 major program areas such as agriculture and natural resources, business and management, education, and social sciences. Within each major classification, there are subclassifications which further define the program areas. In the social sciences classification, for example, there are 16 subclassifications including categories such as anthropology, economics, and sociology.

The table on the next page shows the kinds of off-campus courses being offered. Three-fourths of the off-campus courses were being taught in seven program areas--education, fine and applied arts, letters, public affairs and services, business and management, social sciences, and psychology. The remaining one-fourth of the courses were being taught in 22 of the other program areas. The only program area in which no courses were being taught off-campus was military science. The most courses, 533, were offered in education.

The community colleges offered courses in the greatest number of program areas, teaching off campus in 25 of the 30 areas. The Regents'

432

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TYPES OF OFF-CAMPUS COURSES OFFERED IN KANSAS
SPRING 1979

Major Program Area	Regents' Universities	Community Colleges	Washburn University	Private Colleges or Universities	Out-of-State Institutions	TOTAL	
						No.	Percent
Education	337	182	-0-	14	-0-	533	27%
Fine and Applied Arts	4	187	-0-	1	-0-	192	10
Letters	33	124	1	12	6	176	9
Public Affairs and Services	147	-0-	-0-	2	16	165	8
Business and Management	20	80	2	25	32	159	8
Social Sciences	73	57	-0-	15	9	154	8
Psychology	61	56	-0-	6	2	125	6
22 Other Program Areas	152	244	10	38	22	465	24
TOTAL	<u>827</u>	<u>930</u>	<u>13</u>	<u>112</u>	<u>87</u>	<u>1,969</u>	<u>100%</u>

universities taught in 21. The Regents' universities did not teach courses in the technological and occupational areas, areas in which the community colleges did offer courses. This reflects the differences in mission between the two types of institutions. Courses taught by the Regents' universities were generally at the junior and senior or graduate levels and were academic in nature. The community colleges taught courses at the freshman and sophomore level and taught both academic and technological courses.

The Regents' universities concentrated their efforts in education, public affairs, social sciences, and psychology. They offered 618 courses, or 75 percent of all their courses, in these four areas, with the majority being taught in education, primarily for teacher certification. The community colleges emphasized education courses, but they also taught a number of courses in two areas not emphasized by the Regents' institutions--fine arts and letters. These three areas accounted for 493 courses, or 53 percent of all those taught by the community colleges. The colleges taught 187 courses in fine and applied arts. This program area includes such subjects as art, music, dramatic arts, dance, ceramics, and photography. They also offered 182 courses in education, mostly in physical education, and 124 courses in letters (English, literature, speech, creative writing, and philosophy).

Washburn University and the private colleges and universities did not concentrate in any one particular area. The out-of-state institutions offered courses primarily in business and management and in public affairs. Appendix B lists all of the major program areas and shows the postsecondary institutions teaching off-campus courses in those areas.

Hobby or Recreation Courses

The inventory identified an issue that needed further analysis--the offering of courses that are potentially hobby or recreational. The Legislative Educational Planning Committee's guidelines for off-campus education state that courses which are hobby or recreation in nature should not receive State funding. The guidelines, however, do not define a hobby or recreation course. The Board of Education, in its course approval guidelines, defines hobby or recreation courses as courses taken largely as a leisure-type activity, and the Board of Regents does not define them at all. With such a vague definition, it is hard to measure compliance with the Committee's policy. The auditors did examine programs which, in their judgment, could include hobby or recreation courses according to the definition. Those programs, along with the number of courses offered in each, are as follows:

<u>Program Areas</u>	<u>Number of Courses</u>	<u>Percent of Total Courses Offered</u>
Physical Education	130	7%
Industrial Arts	75	4
Fine Arts	<u>192</u>	<u>10</u>
	<u>397</u>	21%

Of the 397 courses, only 37 were taught by Regents' universities, and 30 of these were industrial arts courses for vocational education teachers. The remaining 360 courses were taught by community colleges.

Some or all of the courses in these areas may well be academic in nature. Without a clear definition, however, academic courses cannot be separated from hobby or recreational ones. The titles of many courses would indicate that they should receive a closer look. In physical education, courses included team sports, social dance, and physical fitness. Most of the industrial arts courses were woodworking courses. Fine arts courses included ceramics, weaving, and photography.

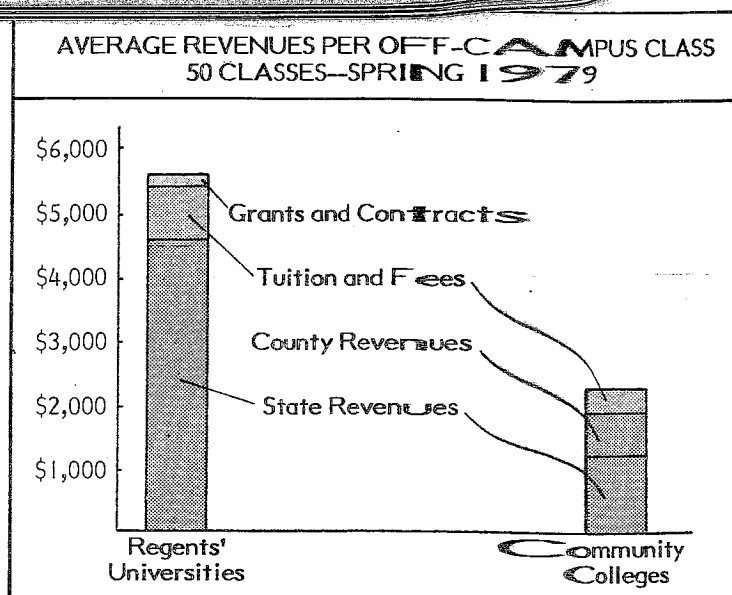
Given the lack of an effective definition, the auditors turned to the students themselves and determined the student's reasons for taking the courses. As part of the audit, students taking off-campus courses were surveyed. Of 400 students who responded, 69 were enrolled in courses in these four areas. When asked why they took the course, 60 of the 69, or 87 percent, said they took it for personal interest rather than to further a career or establish a new one. It thus appears that in the students' minds at least, the courses are hobby or recreational in nature. Under legislative guidelines, such courses should not receive State aid.

To some extent, the recreational nature of many of these courses has been recognized. The State Board of Education has already taken some steps in the area of off-campus physical education courses. The Board has

decided that, effective July 1, 1980, State aid will not be granted for physical education courses offered outside a community college's district. Such a change would eliminate State funds for 55 of the 130 physical education courses that were taught off campus by the community colleges in the Spring of 1979. The industrial arts and fine arts areas are unaffected.

Off-Campus Revenues and Costs

No postsecondary institution accounts for its off-campus instruction separately from its on-campus instruction. As a result, it is difficult to develop an accurate estimate of the revenues that are generated by the off-campus program or the costs of off-campus instruction. Legislative Post Audit was able, however, to develop a rough estimate of revenues and direct costs for off-campus instruction. The auditors selected 25 typical off-campus courses taught by Regents' universities and 25 typical off-campus courses taught by community colleges. The 50 courses chosen had an average enrollment of 14 students. The universities and community colleges were then asked to supply their best estimate of the total revenues and direct costs for the 50 courses, using a methodology developed by Legislative Post Audit. The methodology took into account such factors as the educational level of the students enrolled in each off-campus course, the various funding rates used for the different institutions, and the percent of faculty time spent on the off-campus course. Only the direct costs of faculty salaries, travel, and rental of space were collected because each college and university had its own definition of which other costs were direct and indirect. Such other costs include the cost of libraries, student services, administration, and classroom materials.

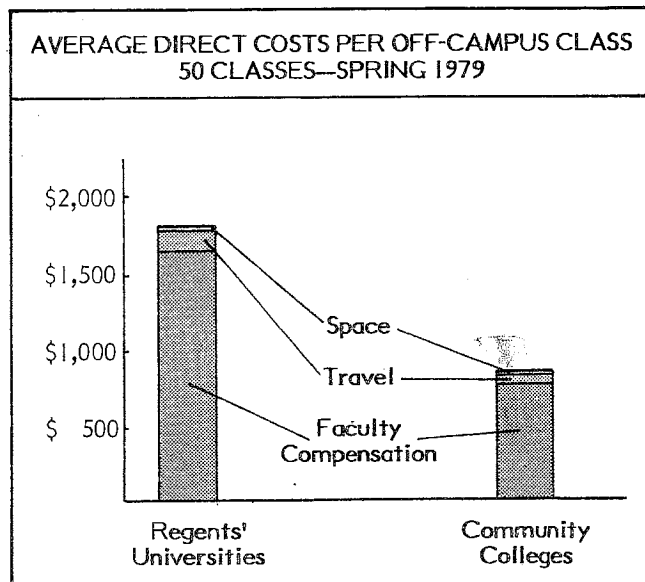


The 50 courses, although not a statistically valid sample, do provide insights into the revenues and direct costs of individual off-campus courses. As the adjacent figure shows, the average revenue per course generated from all sources for the 25 Regents' courses surveyed was \$5,646. For the community college courses, it was \$2,258. For both the Regents' and community college courses, roughly 17 percent of the revenue was generated from student tuition and fees. For the Regents' courses, almost all of the remaining 83 percent was from the State; and for the

community college courses, 53 percent was from the State and 30 percent was from the county. If the average revenues generated for these 50 courses were applied to all 1,969 off-campus courses, total revenues generated by off-campus instruction in Spring 1979 would have been \$6.2 million. Approximately 70 percent, or \$4.4 million, would have been provided by the State.

The figure on this page shows the direct costs for the university and community college courses. The average direct costs of the 25 Regents' courses were \$1,833. The

average direct costs for the community college courses were \$844. In both cases, faculty compensation accounted for 93 percent of the costs. The cost of travel and rent was relatively small, amounting to only seven percent of the total direct costs. Thus, the difference in cost is attributable to differences in average faculty pay.



There is a large difference between the total revenues generated by the off-campus courses and the direct costs of these courses. For the courses taught by Regents' universities, 68 percent of the revenues were left after direct costs were paid, and for the community colleges, the figure was 63 percent. The remainder of the money was available for meeting such other operating expenses as administration, research, libraries, and maintenance.

A major question with regard to off-campus courses is whether they are "money-makers" for the schools--that is, whether they are less expensive to put on than on-campus courses and thus generate extra money that can be used to subsidize more than their share of other expenses. The auditors tried to address that question but found no answers. The schools do not have an accounting system that apportions indirect costs such as administration and student services to off-campus courses, and they do not even agree on the indirect costs that should be included. As a result, the auditors could not determine whether the money left over was too much or too little to pay for indirect costs that could be legitimately attributed to the off-campus program. If such courses cost less to run than they generate in revenues, aid for them could conceivably be reduced.

Size of Off-Campus Enrollments

The 1,969 off-campus courses had a total enrollment of 26,795 students, with enrollments ranging from one to 205 students and averaging 13 students per course. The courses generated a total of 72,364 off-campus credit hours. The average course generated 37 credit hours.

Many of the courses are small. More than 65 percent of the courses had fewer than 15 students. Of these, 362 had fewer than five students, 471 had between 5 and 10 and 454 had between 10 and 15 students. The size of off-campus courses, like their cost, is another matter of concern. When size is the issue, however, the concern is usually that very small classes lose money. This means that revenue from other courses or from the on-campus program must subsidize the class. The auditors found that most of the courses with fewer than five students were internship, independent study, or directed readings courses--courses that often have small enrollments on campus as well. Most of the courses with six to 14 students, however, were courses that could accommodate more students.

The auditors tried to determine the effect of off-campus enrollments on the total enrollments at postsecondary institutions, both in Spring 1979 and earlier. They found that because of the many different definitions of off-campus courses, the information about off-campus enrollments at the various schools is not totally comparable. With such constraints kept in mind, however, the information can still provide an indication of the trends in off-campus enrollment. The table below shows the off-campus enrollments for Spring 1978, 1979, and 1980 and the relationship of off-campus enrollments to total enrollments. The enrollment is given in terms of full time equivalent students, a measure that takes into account students with

OFF-CAMPUS ENROLLMENTS FOR KANSAS SPRING 1978-1980							
Type of Institution	1978		1979		1980		Percent Change in Off-Campus Full-Time Equiv.
	Full-Time Equiv. Enrollment	Percent of Total Enroll.	Full-Time Equiv. Enrollment	Percent of Total Enroll.	Full-Time Equiv. Enrollment	Percent of Total Enroll.	
Regents' Universities	2,608	4.4%	2,872	4.9%	2,967	5.1%	13.8%
Community Colleges	1,210	7.0	1,660	9.6	1,573	9.0	30.0
Washburn University	64	1.6	34	0.9	23	0.6	64.1
Private Colleges/ Universities	<u>329</u>	<u>2.8</u>	<u>388</u>	<u>3.2</u>	<u>395</u>	<u>3.2</u>	<u>20.1</u>
TOTAL	<u>4,211</u>	<u>4.6%</u>	<u>4,954</u>	<u>5.4%</u>	<u>4,958</u>	<u>5.4%</u>	<u>17.7%</u>

differing numbers of credit hours. For example, the credit-hour load of an institution would be very different if it had five students, each taking 12 credit hours, than if it had five students, each taking one credit hour. The full-time equivalent student measure takes the total credit hours generated by an institution and converts them into the equivalent number of full-time students, as if all students had chosen to take full courseloads.

Off-campus full-time equivalent enrollments have increased approximately 18 percent over the last three years from 4,211 to 4,958. The only school that did not experience an increase was Washburn University, where off-campus enrollment declined by 64 percent. In the same period, on-campus full-time equivalent enrollments decreased by 0.6 percent. In Spring 1980, off-campus enrollments accounted for 5.4 percent of the total full-time equivalent enrollment of the various institutions. The greatest increases occurred at the community colleges, where off-campus students now comprise 9 percent of total full-time equivalent enrollments. At the Regents' schools, they comprise 5.1 percent of the total. Overall, off-campus enrollments are becoming a more significant part of the total enrollments of the postsecondary institutions. This is particularly true for the community colleges, although total off-campus enrollment at those colleges declined slightly between Spring 1979 and Spring 1980.

Students Taking Off-Campus Courses

The auditors surveyed Regents' university and community college students taking off-campus courses to find out their backgrounds and their reasons for taking an off-campus course. Approximately 400 students responded to the survey.

Based on the information in the responses, the typical off-campus student is 35 years old, female, married, and employed full-time. She has completed some college work, is going to school part-time (taking an average of five credit hours off campus), and is not working toward a degree. She is taking courses primarily to improve her knowledge and skills in her current career. Convenience of location and time seem to be important, but she would be willing to travel up to 15-20 miles to take a course, if necessary. Because she is working full time, she feels that taking courses off campus is the only way she can continue her education.

This general picture breaks down a bit when the different kinds of institutions are taken into account. The auditors found basically no difference between Regents' university and community college students in a number of characteristics, including age, sex, marital status, or the number of credit hours enrolled in. For several characteristics, however, there were differences. These characteristics can be summarized as follows:

	Regents' University Students	Community College Students
Average Number of Years Since Last Attending School	3	7
Educational Level (Most Frequent Response)	Bachelor's Degree	Some College
Employment Status		
Full-time	163 (77%)	105 (59%)
Part-time	22 (10%)	31 (17%)
Retired/Not Employed	26 (13%)	43 (24%)
Working Toward Degree	57%	36%
Reason for Taking Course (Most Frequent Response)	Improvement in current career	Personal development and enrichment
Average Miles Traveled to Course	12	8
Average Miles Willing to Travel	25	18

There was a four-year difference in the time since the student had last attended school, university students averaging three years and the community college students averaging seven. University students generally held bachelor's degrees, while the community college students had completed some college work. More of the university students were employed full-time, and more were working toward a degree. Students at Regents' universities were generally taking the off-campus course to improve their skills in their current career, while the community college students were taking the course for personal development and enrichment. Finally, the Regents' students generally traveled farther to class and were willing to travel farther than community college students.

Conclusion

Off-campus education is growing. In the past three years, off-campus enrollments have increased approximately 18 percent. At the same time, on-campus enrollments were dropping slightly. In Spring 1979, the semester for which Legislative Post

Audit's course inventory was conducted, almost 2,000 off-campus courses were offered in the State by public and private colleges and universities. The State's public universities and community junior colleges offered about 90 percent of these courses.

Off-campus courses are offered in almost every subject, but more than three-fourths are in seven major subject areas--education, fine and applied arts, letters, public affairs and services, business and management, social science, and psychology. Twenty-one percent of the courses offered are State-supported courses that may be primarily recreational. Most of these courses were offered by community colleges. Legislative guidelines state that hobby or recreational courses should not receive State support, but the Department of Education's definition of a hobby or recreation course is so vague that recreational courses cannot be separated from academic ones. Most of the students surveyed by the auditors said they were taking these courses for personal development, not for careers or degrees. Their attitude would indicate that such courses are hobby or recreational. Action is being taken to eliminate State funding for some of these courses, but the vagueness in the definition remains.

An analysis of a sample of the off-campus courses at the Regents' universities and the community colleges showed that the tuition, fees, and State and local revenues generated by the courses were more than double the amount needed to pay the direct costs of the instructor's salary, the instructor's travel, and off-campus classroom space. The auditors could not determine the portion of other expenses such as administration, student services, research, and libraries that such courses should be expected to bear. The schools do not make such breakdowns of expenses for their off-campus programs. It was thus impossible to determine whether the courses are less expensive to put on than on-campus courses and thus generate extra money that can be used to subsidize more than their share of other expenses.

Off-campus courses vary widely in size. The average class has an enrollment of 13, with more than 65 percent of the classes having fewer than 15 students. Many of the smallest classes--those with fewer than five students--are courses such as internships, directed readings, or independent study. These courses often have small enrollments on campus as well.

Students who take off-campus courses generally work full time and are older than traditional college students. Students taking courses offered by Regents' institutions differ from those taking community college courses in several respects. Those in

university off-campus courses generally have a degree and are working toward another one to improve their careers; those taking community college courses generally do not have a degree and are taking courses for personal development and enrichment.

Recommendation

The State Department of Education and State Board of Regents should develop a clear and workable definition of hobby and recreational courses in order to separate courses that should receive State aid from those that should not. The Department and Board should submit the definition to the Legislative Educational Planning Committee for review. By July 1, 1981, the Department and Board should also report to the Committee on the definition's impact, if any, on State funding for such courses.

CHAPTER IV

DUPLICATION OF OFF-CAMPUS COURSES

In recent years, the Legislature has been concerned that the State's off-campus program is not effectively coordinated by the many colleges, universities, and supervisory boards that are part of the program. One of the greatest concerns is that the various institutions may be duplicating each others' courses and programs. As part of this audit, Legislative Post Audit examined off-campus offerings to assess the duplication that was occurring and the problems that were causing it.

Defining Duplication

The auditors found that, just as there is no standard definition of an off-campus course, there is no standard definition of duplication. Calls to professional and governmental organizations produced various factors that had to be kept in mind when deciding what duplication meant, but no single, clear definition was found. Some of the factors to be kept in mind are the nature of the course (lower division, upper division, or graduate), the institution offering the course, the demand for the course, and the distance between the locations of the courses.

Given the emphasis the Legislature has placed on coordination of the off-campus program, duplication has several different meanings that should be incorporated in a definition. It would certainly appear to be duplication when two schools offer the identical course in the same location. However, duplication may also take less apparent forms. For example, if two schools offer different business courses in the same general location, they can still be duplicating each other even though the courses are not identical. In such cases, the schools are operating separate--but similar--programs in a given subject, and these programs may have little or no coordination with each other. Such an approach does not appear to be in keeping with the Legislature's intent.

Legislative Post Audit took these various factors into consideration and developed the following definition of duplication: **two or more courses that either are identical or are part of the same program and that are being offered at locations within 20 miles of each other.** Several reasons were involved in selecting a radius of 20 miles as the distance within which a course would be considered to be duplicated. A study submitted to the State

Education Commission and the Board of Regents in 1975 indicated that students were willing to travel an average of 20 miles to take advantage of continuing education opportunities. This radius also appears reasonable given the responses in the student survey conducted by Legislative Post Audit. The average distance students indicated they would be willing to travel to take a course was about 20 miles.

With this definition of duplication, the auditors then identified every city where an off-campus course was located and where an identical course, or one in the same program, was taught within a 20-mile radius of that location. Whenever the 20-mile radius included the home campus of a postsecondary institution, the on-campus offerings of the school were also reviewed to determine if the off-campus course was duplicating an on-campus course or program. In this analysis, courses taught by an institution in its own home town but off its main campus were treated as on-campus courses in order to avoid overstating any duplication that was occurring. Also excluded were multiple sections of a single course taught by the same school if the average enrollment of all the sections was 15 or more students.

Extent of Duplication

Under the definition established by Legislative Post Audit, duplication can take several forms. These forms, which are illustrated in the box on the opposite page, can be described as follows:

1. A specific course, such as Speech 101, can be offered in the same geographic area by two or more schools. This is the most obvious form of duplication. The auditors called it **course duplication**.
2. Courses in a general subject area, such as speech or business, can be offered in the same geographic area by two or more schools. In this case, the courses are not identical, but the courses may compete for students who are interested in a subject area. The problem in such cases is that the courses are being offered under different programs that may have little or no coordination with each other. One institution may offer a course one year, and the second institution may offer the identical course the next. The auditors called this **program duplication**.

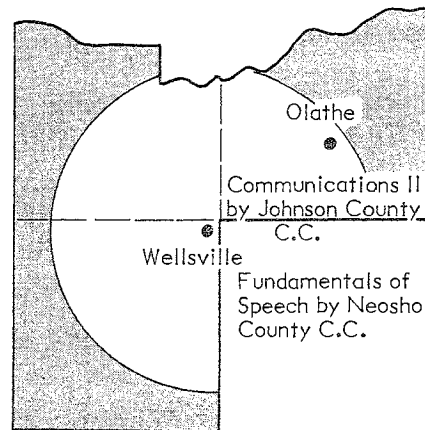
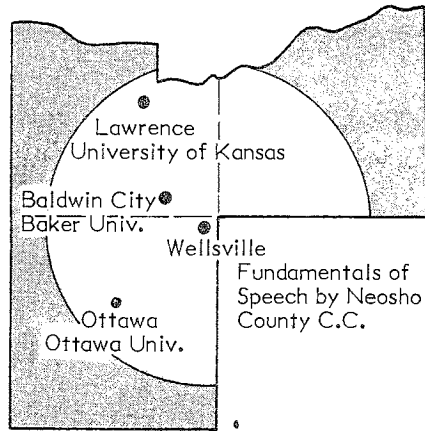
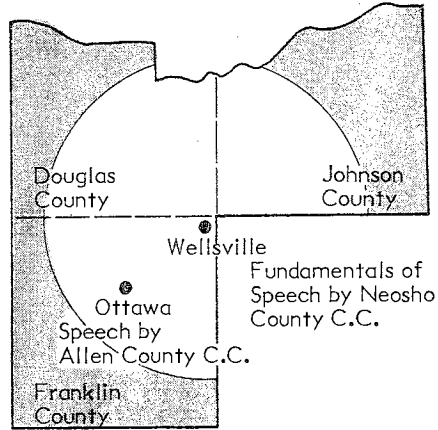
The auditors found two kinds of program duplication. In the first, off-campus courses were being offered within 20 miles of a campus where courses in the same program area were also offered. In the second, courses were being offered by different schools at off-campus locations within 20 miles of each other.

FORMS OF DUPLICATION

Duplication in the off-campus program can take several forms. The most obvious form occurs when two or more schools offer identical courses near each other. In Spring 1979, as the illustration on the right shows, Neosho County Community College offered an introductory speech course in Wellsville. Allen County Community College offered the same course in Ottawa, less than 20 miles away. This is called **course duplication**.

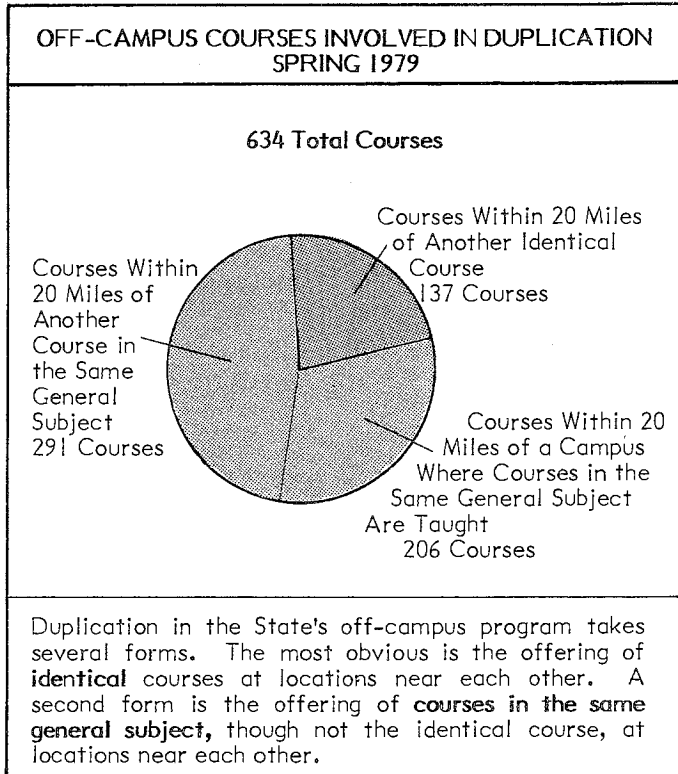
Another form of duplication occurs when an off-campus course is offered near the campus of a college or university that offers courses in the same subject area. As the illustration on the right shows, the introductory speech course in Wellsville was within 20 miles of three campuses--the University of Kansas, Ottawa University, and Baker University. All three universities have speech programs. This is a form of **program duplication**.

Duplication occurs in yet another way. Two institutions may offer off-campus courses near each other that are in the same general subject area, though not identical. The introductory speech course in Wellsville, for example, is within 20 miles of another speech course, Communications II, offered in Olathe by Johnson County Community College. In such situations, schools are operating separate off-campus programs in a given subject, and these programs may have little or no coordination with one another. Such an approach does not appear to be in keeping with the Legislature's intent.



The auditors examined the 1,969 off-campus courses taught in Spring 1979 and found that 634 were involved in some form of duplication. The accompanying figure shows the number of courses involved in each kind of duplication. In brief, the auditors found the following:

1. Of the 634 courses, 137, or 22 percent, were course duplication-- that is, they were duplicating an essentially identical course. The auditors rarely found courses duplicated at the exact same location, but they did find them duplicated within 20 miles of each other. There were 23 different types of classes, such as sociology, accounting, and fundamentals of art, which were being duplicated. A total of 48 locations were involved, and the courses involved had an average enrollment of 11.2 students.
2. Thirty-two percent of the 634 courses, or 206 courses, were being offered within 20 miles of a campus that offered courses in the same program area. Thirty-nine campuses were involved; 19 were public and 20 were private. Although the identical course was not being taught at the campus during the same semester, the auditors did find that the identical course was a part of the campus curriculum in many cases. The 206 courses in this category had an average enrollment of 11 students. A wide variety of programs was involved.



3. The remaining 291 courses, or 46 percent of the total, were courses that were duplicated by another off-campus course taught within 20 miles. The courses were not identical but were in the same program area. The average enrollment in these courses was 17.4 students. Again, a wide variety of programs was involved.

The table on the next page shows which kinds of schools were offering these courses. More than three-fourths of the courses were taught by the Regents' universities or the community colleges. The Regents' universities taught 212 courses, or 33 percent of the total,

DUPLICATED COURSES BY TYPE OF INSTITUTION SPRING 1979				
	<u>Identical Courses</u>	<u>Courses Close to a Campus</u>	<u>Courses Close to Another Off-Campus Course in Same General Subject</u>	<u>Total</u>
Regents' Universities	8	33	171	212
Community Colleges	118	118	41	277
Private Colleges and Universities	5	30	41	76
Out-of-State Institutions	<u>6</u>	<u>25</u>	<u>38</u>	<u>69</u>
TOTAL	<u>137</u>	<u>206</u>	<u>291</u>	<u>634</u>

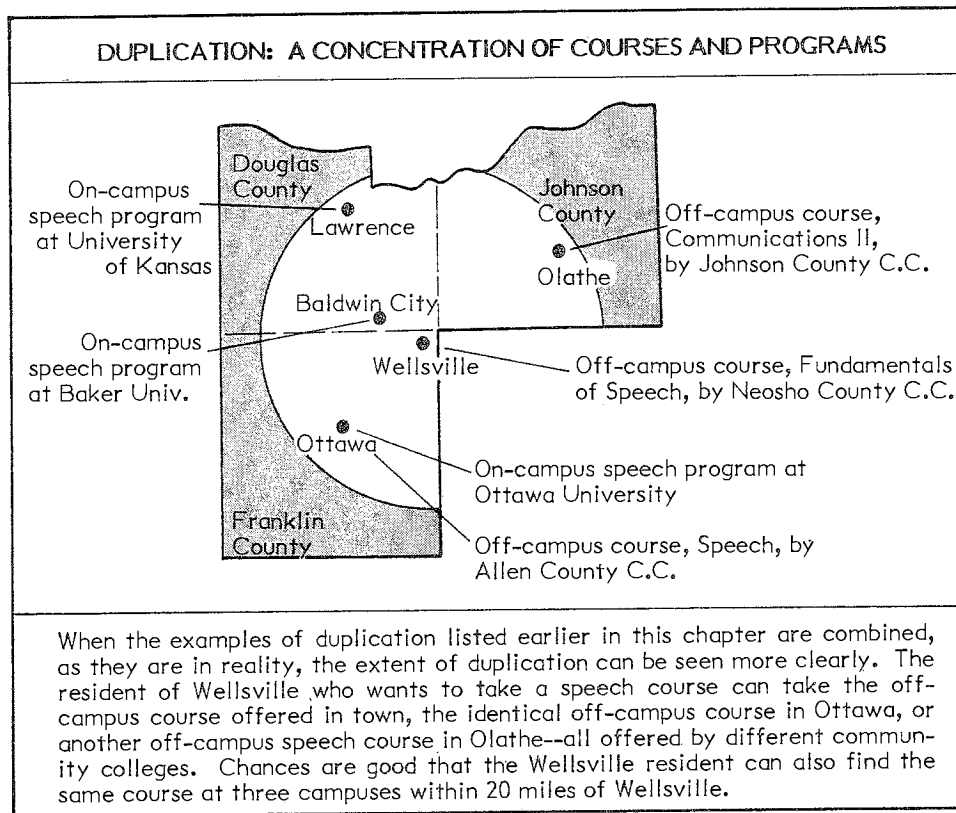
and the community colleges taught 277, or 44 percent. Private colleges and universities and out-of-State institutions split the remainder about equally.

As the table shows, the community colleges taught nearly all of the identical courses that were duplicated. Of the 137 such cases, the community colleges taught 118. The community colleges also taught the majority of courses offered within 20 miles of a campus. The Regents' institutions had the majority of off-campus courses that were taught within 20 miles of another off-campus course in the same program area.

As part of this audit, Legislative Post Audit compiled lists of the 1,969 off-campus courses. These lists show the courses that were involved in duplication. The lists were too long to include with this report, but they are available upon request.

Major Locations and Programs in Which Duplication Is Occurring

To make the kinds of duplication easier to understand, each was presented separately above. In reality, the various kinds all exist together. The examples on page 29 of the various kinds of duplication, for example, are all in the same geographic area. When all the courses, all the institutions, and all the programs are put together, as they are in the figure on the next page, the problem becomes much more complex. The example shows that, given the proximity of off-campus courses and on-campus programs, a resident of Wellsville has six speech programs to choose from within 20 miles. Four of these are offered by public institutions. Examples



such as these show that duplication must be considered as something more than just the offering of identical courses.

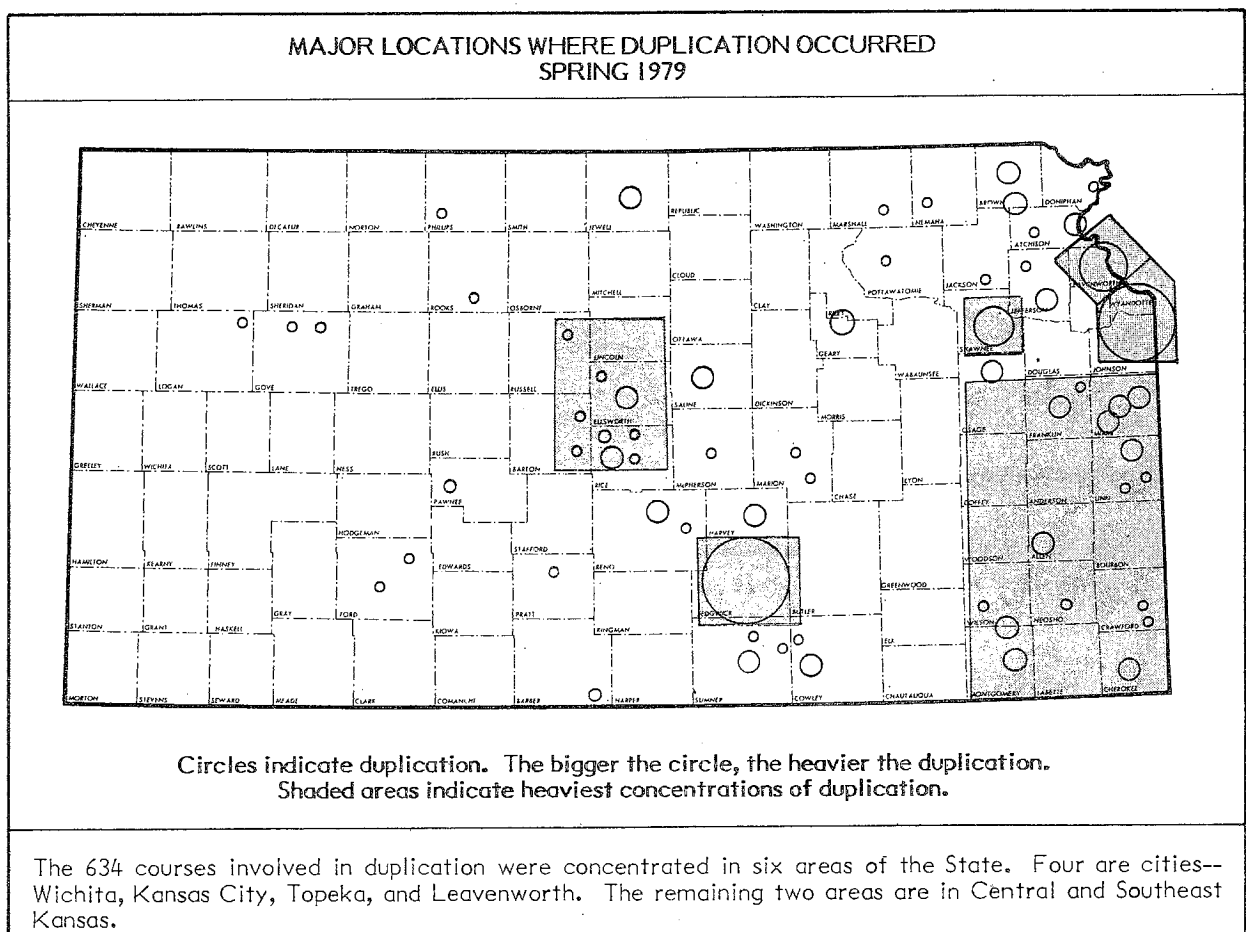
The auditors found instances of duplication in many subject areas and many locations throughout the State. The example of duplicated speech courses around Wellsville, for example, is one of 41 in which duplication occurred for programs in "letters"--English, speech, literature, philosophy, and similar subjects. The auditors found duplication in six major program areas--education, letters, business, social science, fine arts, and psychology. The number of locations where duplication was found is as follows:

<u>Program Area</u>	<u>Number of Locations Where Duplication Occurred</u>
Education	53
Letters	41
Business	40
Social Science	33
Fine Arts	32
Psychology	27
Other Programs	57

More than one program was duplicated at some locations. Although duplication was found in many locations, it was concentrated in several areas. The map below shows that duplication was heaviest in the Kansas City/Shawnee Mission area, the Leavenworth/Lansing area, Southeast Kansas, Wichita, Topeka, and the Barton/Ellsworth/Rice County area.

Duplication of identical courses was prevalent in the Barton/Ellsworth/Rice County area. For example, Accounting I was offered by Barton County Community College at Bushton, Ellsworth, and Genesco with enrollments of 8, 12, and 8. Ellsworth and Genesco are within a 20-mile radius of Bushton. There was also substantial course duplication in Southeast Kansas.

Duplication involving off-campus courses and nearby on-campus programs was the major problem in the Wichita area, where Butler County Community College and several out-of-State institutions offer courses in programs also available on campus from Wichita State University, Friends University and Kansas Newman College. This same type of duplication was



the primary problem in Southeast Kansas, where many of the off-campus locations are within 20 miles of two and sometimes three campuses. For example, nine courses were taught by Independence Community College in Cherryvale, which is within 20 miles of three community college campuses. Some of this type of duplication was also present in the Topeka area between off-campus offerings and Washburn University's on-campus programs.

Program duplication in which schools are offering off-campus courses in the same program area within 20 miles of each other best describes the duplication in the Kansas City area. Because of the great demand in the metropolitan area, private and out-of-state institutions, as well as several Regents' universities, offer courses in the same programs. Some of these courses also duplicate the on-campus offerings of the two community colleges and two private institutions that have campuses in the area.

Finally, the Leavenworth/Lansing area contains all three types of duplication with coordination made more difficult by several special circumstances. First, there are several special groups to be served at the State and federal prisons in the area and at the military base in Leavenworth. Second, there is a four-year private institution, St. Mary College, in Leavenworth. Compounding the situation, the military bases and prisons are exempt from the service area guidelines of both the Board of Education and the Board of Regents, so a number of State institutions travel outside their service areas to offer courses there. To illustrate this, the offerings in the general psychology area in Leavenworth and Lansing area are listed below with the sponsoring institution and the location of the courses.

<u>Course</u>	<u>Institution</u>	<u>Location</u>
Psychology and Personal Adjustment	Highland C.C.	Federal Prison
General Psychology	Kansas City Kansas C.C.	Community
Personality	Univ. of Kansas	Community
Abnormal Psychology	Univ. of Kansas	Community
Seminar in Human Potential	Emporia State Univ.	Community
Child Psychology	St. Mary College	State Prison

Reasons for Duplication

Once the duplicated courses had been identified, the auditors began looking for the reasons for the duplication. They first checked for the existence of a policy for off-campus course approval. Although they found no comprehensive guidelines that covered all types of institutions, they did find guidelines under which each type of institution (Regents' university or

community college, for example) operates its off-campus program. In general, the auditors found full compliance with the various approval processes. This finding, taken together with the large number of instances of duplication, leads to the conclusion that duplication is not a compliance problem but a problem with the policy itself. Therefore, the auditors examined the policies of each type of institution to find the weaknesses in the existing policies.

Off-Campus Policies of the Board of Regents

The Board of Regents' policy requires that off-campus courses be submitted to the Board's extension officer for approval. The criteria used to approve the courses include the institution's ability and willingness to offer sequential work, to provide support services, and to hire faculty to teach the course as a part of their regular load; geographic proximity; history of institutional offerings at the location; and client preference. Specialty area courses--those courses in programs offered by only one institution--are also generally approved.

Duplication by Regents' universities was primarily that of offering courses in the same program area in the same general location. In response to the auditors' inquiries about such duplication, the universities said they generally relied on the Board of Regents' approval process to coordinate off-campus offerings. The Board's extension officer explained that more than one university offers courses in the same program at a particular location when there is more demand for courses at that location than one university can handle or when a client group requests a particular university. For example, in the Kansas City area, the University of Kansas, Kansas State University, and Emporia State University all offered graduate-level education courses. The extension officer indicated that the University of Kansas serves Johnson County but is not able to serve the entire area without help. The extension officer said that when one school was able to serve Wyandotte County, the others would not offer courses there.

A proviso in the 1981 budget of the Board of Regents creates service areas for the Regents' institutions. The proviso assigns the Kansas City area to the University of Kansas and Pittsburg State University. It forbids State aid to courses taught by any other university at that location unless the Board of Regents determines that these two are unable to offer the courses. In light of past determinations on what is required to serve the Kansas City area, it is very possible that there will still be universities other than the University of Kansas and Pittsburg State receiving State funding for courses taught in the Kansas City area.

Off-Campus Policies of the Board of Education

The formal policy adopted by the Board of Education for off-campus courses requires that community colleges not offer courses in the counties

where Regents' universities are located except for courses offered at military bases. The policy also requires advance consultation with any institution whose home town is to be an off-campus teaching location. In addition to developing this policy, the Board has also assigned each community college a service area where it has first option to offer off-campus courses.

Duplicate community college courses fell mainly into two of the categories of duplication: duplication of identical courses less than 20 miles away, and duplication with existing on-campus programs (but not necessarily the same course) less than 20 miles away. The most frequent response given by the colleges when asked why they offered multiple sections of the identical course within 20 miles of each other was that they were serving the needs of their service area and that students wanted the courses offered in their own town. (It should be remembered that the auditors excluded multiple sections if the average enrollment in the sections was more than 15. The only courses considered as duplicate were those with smaller average enrollments.) When asked why they offered courses within 20 miles of a campus, the colleges again responded that they were meeting the needs of students in their service area. When the campus was a private college or university, they also noted that their tuition was much less and that their students should not be forced to pay the higher tuition of the private institution.

Two points should be made about the Board of Education's policies. First, with courses that are offered near a campus, the guidelines require only consultation with, not approval by, the resident institution, and consultation is required only if the course is to be offered in the home town of the institution, not if near the town. Second, it appeared to the auditors that the schools seem to feel obligated to offer courses at every town in their service area if students request a course, regardless of how many locations such an approach may require or how near the courses may be to each other or to a campus. Even Allen County Community College, which is making an effort to improve on this area of control, wants to establish 17 service centers in five counties. No limit is placed by the Board of Education on the number and choice of locations at which courses will be offered within a service area. Because of these policy weaknesses, 118 community college courses were involved in course duplication, and 118 more were involved in on-to off-campus program duplication.

Private and Out-of-State Institutions

The private colleges and universities are not heavily involved in the offering of off-campus courses. However, they follow the Board of Education policy of advance consultation before offering courses in the

home town of another institution. There is no other policy, however, that restricts the choice of off-campus locations by the private institutions, and the auditors found 76 of their courses involved in duplication. Ten of these were courses offered by one private institution near another private institution.

Out-of-State institutions in Kansas are regulated only in that they are required to register their presence in the State with the Board of Regents. There were 69 out-of-State courses involved in duplication. Most of these duplicated existing programs in Kansas City, Leavenworth/Lansing, and Wichita.

Lack of a System-Wide Policy

State-wide policy for the off-campus program exists only in the form of the Legislative Educational Planning Committee's general statement of principles. The lack of a detailed State-wide policy has allowed the development of independent policies by the various kinds of institutions offering off-campus programs. The effectiveness of this approach is limited in resolving duplication, particularly when the overlap of courses or programs becomes particularly complicated. Obviously, in the duplication the auditors found, all the various courses were perceived by those offering them as meeting a need, and all the institutions would probably argue that their classes should be continued. If courses and programs are to be better coordinated, there is no group with system-wide control to decide which courses should be offered by which schools. Because of the overlap among the types of institutions, changing the existing fragmented policies will not deal effectively with the problem.

A considerable amount of State aid is involved in these courses. The auditors estimated that the enrollment in these 634 courses resulted in the payment of about \$975,000 in State aid to the sponsoring institutions. (This amount excludes courses outside the budget base of the Regents' institutions and courses that are taught at prisons and military bases and do not receive State aid.) Reducing duplication will not drop this amount, because State aid is based on the number of students, not the number of courses. If the same number of students are taught in fewer courses, aid will still stay the same. However, greater efficiency should lower costs. Salaries, travel expenses, space rental, and other costs should drop, and the savings could be put to more effective use elsewhere.

To make the off-campus program more efficient, greater State-wide coordination of the program is needed. The clearest illustrations of this need are those areas of the State, such as Kansas City and Wichita, that

offer a heavy market for courses in a variety of subjects. This market is currently being served piecemeal, with as many as 12 schools involved in some locations.

Control of Duplication by Other States

The increase in off-campus postsecondary education and the problems associated with it are not unique to Kansas. The auditors identified six states--Idaho, Missouri, Oregon, Texas, Virginia and Washington--which have taken steps to alleviate the problems that accompanied the growth in off-campus education. Many of the problems addressed in this audit were also identified in these other states. The problems included the need for system-wide coordination, the need for regions that geographically constrain the offerings of all state schools, and the need for effective involvement of private and out-of-state institutions in the system.

State-Level Coordinating Boards

All six states have a state-level coordinating board. In all six states, this coordinating board is to control off-campus education throughout its state, and in all six, the board has been designated as the state's 1202 Commission. Four of the six states have boards similar to the 1202 Commission in Kansas in that their course approval and enforcement powers are limited. These states, like Kansas, have used an approach of voluntary cooperation in dealing with the institutions. In Kansas, the result of this approach has been that the only policies adopted are those jointly agreed to by the Board of Education and the Board of Regents. Each segment then defines the terms of the policy such as unnecessary duplication as it chooses, and the Legislative Educational Planning Committee is unable to approve or disapprove of its interpretation. In contrast, Texas and Virginia have taken a regulatory approach and have given the state level coordinating board the final approval power over off-campus offerings.

The Legislative Educational Planning Committee in Kansas would have difficulty, however, in taking the regulatory approach used in Texas or Virginia because it would be a legislative body performing an executive branch function. Such an approach creates legal problems already confronted by the State in the issue of the authority of the State Finance Council.

Use of Regional Education Service Areas

In contrast to Kansas, which has separate service areas for the Regents' universities and the community colleges, all six of the other states

examined have divided their states into regions which encompass all postsecondary institutions. Five of the states delegated the boundary decisions to their state boards and one, Texas, legislated regional boundaries. All six states considered geography in drawing the lines, and in Texas, population centers were also taken into account. The State coordinating boards mediate disputes at the regional level and set rules for cooperation within regions. Also, Texas and Virginia require cooperation within regions as a part of the approval process for off-campus courses. Idaho has one additional requirement within regions: it requires identification of educational centers. These are locations where off-campus courses will be offered. Establishing such centers provides some centralization of off-campus courses and simplifies the providing of support services. Overall, the concept of regions encompassing the various types of institutions enhances cooperation in course offerings and in providing support services at off-campus locations.

Role of Private Institutions

Of the six states studied, only Virginia has made a concerted effort to involve private institutions. Even there, however, involvement is voluntary to the extent that the private institutions choose whether to participate in the system. Once they decide to participate, however, they are bound by the decisions of the state board with respect to off-campus education. The remaining states take the position that because they cannot control the offering of off-campus courses by private institutions, there is no reason to include them in the process.

Registration and Approval of Courses Taught by Out-of-State Institutions

Each of the six states has also been concerned with controlling the offering of courses in their states by out-of-state institutions. Two of the states, Idaho and Texas, do more than require out-of-state institutions to register course offerings with the state board. Texas' coordinating board has the power of final approval in allowing out-of-state institutions to offer courses in Texas. Idaho requires that out-of-state courses be of comparable quality to those taught by the public institutions in Idaho. In contrast, Kansas requires only that out-of-State institutions register with the Board of Regents. The Board sets no quality standard and has no authority to approve or disapprove the courses.

Options for Addressing Duplication In Kansas

To bring about greater coordination of the off-campus program, the State needs two things: a clear policy that applies to all State-aided

colleges and universities, and a group to put that policy into effect. It is Legislative Post Audit's conclusion that a statutory policy covering geographic service areas and course locations should be established. Otherwise, the conflicting policies of the various institutions can be expected to continue.

As this chapter has shown, however, duplication is a complicated issue. A clear statutory policy will help resolve problems, but decisions about boundaries and about conflicts between schools will have to be made by some designated body. In Kansas, there appear to be the following three options for creating such a body:

1. Placing such responsibility with the Legislative Educational Planning Committee. The responsibility would, however, place an executive branch function in a legislative body. Such an approach creates legal problems already confronted by the State in the issue of the authority of the State Finance Council. Problems were resolved in that instance when it was agreed that legislators on the Council would not vote on matters pertaining directly to administrative responsibilities of the executive branch. If the Planning Committee were to take a greater role in regulating off-campus courses, non-legislators would have to be added, and those members would have to make the decision about approving off-campus locations, service area boundaries, and other related issues.
2. Creating a new body, comprised perhaps of representatives of the colleges and universities, the Board of Regents and Board of Education, and the public at large, and giving it the responsibility for such decisions. Such a body would have no responsibilities except the coordination of off-campus education.
3. Placing full responsibility for coordinating the off-campus program with the Board of Regents. Constitutional provisions appear to restrict the Board of Education from performing such a consolidated function, but the Board of Regents could apparently do so. This approach would give the Board the responsibility for coordinating the off-campus courses of community colleges and the Regents' universities.

Conclusion

Duplication in the State's off-campus program takes several forms. The first and most obvious is the offering of identical courses at locations near each other. A second form is the offering of courses in the same general subject, though not

the identical course, at locations near each other. Both forms are involved in any consideration of duplication, because both may work against the Legislature's directive that off-campus offerings be coordinated as fully as possible.

About one-third of the 1,969 off-campus courses offered in Spring 1979 fit one of these categories of duplication. The courses were concentrated in six main subjects--education, letters, business, social science, fine arts, and psychology. They were also concentrated in six main areas of the State--Kansas City, Wichita, Topeka, Leavenworth, Southeast Kansas, and the Barton/Ellsworth/Rice County area. More than three-fourths of the courses were offered by the Regents' universities and the community junior colleges.

At present, the various kinds of institutions set their own policies for offering off-campus courses. The policies of the Regents' institutions, for example, are largely independent of the policies of the community colleges. The independent policies create much of the duplication. Provisions within the individual policies themselves also allow some of the duplication. The auditors found instances in which courses were in full compliance with the policy but were still involved in duplication. To make the off-campus program more efficient, greater State-wide coordination of the program is needed.

Recommendations

To increase efficiency in the offering of off-campus courses and to reduce duplication of courses and programs, the following steps should be taken:

1. The Legislature should establish statutory policies and guidelines for controlling the off-campus program. The statutory policies and guidelines should include the following:
 - a. Regional service areas. Regional service areas that will apply to all public postsecondary institutions should be required. Decisions on service areas should be based on the following statutory criteria:
 - size of the student population
 - size of the geographic area
 - number and location of postsecondary institutions
 - ability of the institutions to provide full academic degree programs

- ability of the institutions to provide support services such as library resources, advising, and the like.
 - b. Locations for off-campus courses. Within regional service areas, set locations should be developed at which off-campus courses may be offered. Decisions on these locations should be based on the statutory criteria set forth above.
 - c. Restrictions on offering courses close to campus. Public postsecondary institutions should be restricted from offering off-campus courses within 20 miles of their home campus.
 - d. Control of out-of-State institutions. K.S.A. 1979 Supp. 74-3251 should be amended to require State approval of courses offered by out-of-State schools. At present, schools are required to register such courses but not to have them approved.
2. The Legislature should place statutory authority for implementing these policies and guidelines, approving exceptions to them, and generally controlling off-campus education in one of the following bodies:
- a. The Legislative Educational Planning Committee. To allow the Committee to perform such an executive function, membership would have to be expanded to include representatives of the executive branch or the general public, and only these other members could be involved in many of the specific decisions about the off-campus program.
 - b. A new body comprised of representatives of the colleges and universities, the Board of Regents and Board of Education, and the general public.
 - c. The Board of Regents.
3. In handling its responsibilities for controlling off-campus education, the designated body should attempt to limit the number of off-campus course locations to one per county, approving more only if special circumstances (such as a high concentration of population) would call for them. The body should require all out-of-State institutions to comply with its policies and should encourage private colleges and universities in the State to do so as well.

CHAPTER V

QUALITY OF OFF-CAMPUS COURSES

The Legislature's expectations about the quality of off-campus education are best demonstrated in the way it has chosen to fund off-campus courses. For example, the Regents' universities now receive State support for most off-campus courses at the same rate as on-campus courses. The decision of the Legislature to fund the universities' off-campus courses was based, in part, on statements that State funding would be necessary if off-campus instruction was to be of comparable quality to instruction on-campus. The community colleges have always received credit-hour aid on the same basis for on and off-campus courses. The Legislature's intent in funding off-campus courses is thus clear: on-and off-campus courses are funded in the same way, with the expectation that they will be of comparable quality.

Measuring Quality

Legislative Post Audit selected three criteria to measure the quality of a course and compared those criteria for a sample of on- and off-campus courses. The criteria used were the qualifications of faculty, the amount and type of work in the course, and the amount of institutional support. The auditors collected data for these three measures by surveying at random approximately 400 off-campus students and 300 on- and off-campus faculty. The on-campus faculty included in the survey were teaching a course on campus that had also been taught off campus. By including a sample of courses taught both on and off campus, the auditors were able to compare how well off-campus courses rated on the three measures in relation to on-campus courses.

The comparison of off-campus instruction to on-campus instruction assumes that the standard to be achieved is that which exists on campus. In other words, it assumes that each school is already providing "quality education" on campus. The auditors did not use this analysis to compare the quality of courses at Regents' universities with the quality at community colleges.

Faculty Qualifications

The auditors asked two questions in their examination of faculty qualifications. First, how did the academic and professional credentials of

the faculty off campus compare with those on campus? Second, how well is the use of off-campus faculty controlled?

Academic and Professional Credentials

Included in the auditors' analysis of faculty credentials were academic degrees, general teaching experience, and professional experience related to the subject matter taught. They also looked at the number of years of teaching experience in the particular subject and any professional certification related to the subject being taught.

In comparing the qualifications of the 120 on-campus and 185 off-campus faculty who responded to the survey, little difference was found. Forty-two percent of the off-campus instructors held masters degrees and 42 percent held doctorate degrees, compared with 43 and 45 percent on campus. The off-campus instructors had 6.6 years of professional work experience in the subject they taught compared with 6.3 on campus, and 12.2 years of general teaching experience compared with 13.2 on campus.

Some difference was found in the number of years of teaching experience in the particular subject area being taught. For off-campus instructors, the average was 6.6 years, and for those on campus, it was 8.6 years. Another difference was found in professional certification in such fields as public accounting, teaching, and social work. This difference appeared primarily at the community colleges, where 72 percent of the off-campus instructors held professional certificates compared with 30 percent of on-campus instructors.

The auditors also asked students about the qualifications of their off-campus instructors. Ninety-two percent of the 400 students responding to the survey found the instructor of their off-campus course to be competent.

Control of Off-Campus Faculty

The auditors' second question in looking at faculty qualifications concerned the control of off-campus faculty. A recent Issues in Higher Education Conference at Kansas State University dealt with off-campus educational quality. Participants from all segments of postsecondary education saw the use of off-campus faculty and part-time faculty in particular as an issue requiring considerable attention. They agreed that off-campus faculty should meet the same standards and qualifications as on-campus faculty and that part-time faculty should be carefully evaluated. They also agreed that monitoring should include systematic evaluation of courses by the college or university and regular contact of off-campus faculty with on-campus faculty. The position taken by the Conference participants is the same as that taken by the North Central Association of

Colleges and Schools, the group that accredits all Kansas colleges and universities.

In keeping with these steps for ensuring quality, the auditors asked off-campus faculty members to indicate how much regular contact they had with the home campus through faculty meetings, research, an office on campus, orientation, and departmental planning. They also asked faculty members to indicate what type of evaluation was done on their off-campus courses. The auditors found that 59 of the off-campus faculty, or 35 percent of those who responded, had no significant contact with the campus. By comparison, 16 percent of on-campus faculty said they did not. These percentages change when the community colleges and Regents' universities are separated. For the community colleges, 63 percent of the off-campus faculty reported no significant contact with the campus, compared with 21 percent on campus. Fourteen percent of the Regents' off-campus faculty reported no significant contact, compared with 12 percent of the on-campus faculty. The gap is much greater for the community colleges than for the Regents' universities.

When asked about evaluations, 88 percent of the off-campus faculty indicated that their course was evaluated in some way. Eighty-two percent of the courses were evaluated by students, 13 percent by peers of the instructor, and 27 percent by the institution's administration. (Some of the courses were evaluated in more than one way.) Twelve percent of the courses had no evaluation.

The fact that all but 12 percent of the courses are evaluated indicates some attempt on the part of the institutions to control quality. A problem exists, however in that the majority of the evaluation is done by students. The Conference on Issues in Higher Education dealt with the effectiveness of student evaluations and concluded that although they are a good measure of student satisfaction, they are not as good a measure of instructors' academic competence or the quality of course content. Administration and faculty peers are best able to provide this type of evaluation. Neither group evaluates off-campus courses extensively.

The auditors also examined a policy implemented by the Board of Regents to control the use of off-campus faculty. The policy provides that if an off-campus course is to be eligible for State funding, it must be taught by a regular faculty member as part of his or her regular teaching load. (A regular faculty member is one who is hired to teach in a particular discipline on a full- or part-time basis and who has taught a course in that discipline on the university's campus at least once in the past two years.) The policy has been in effect since 1974, and it was developed in part as support for the Board's request for State funding for off-campus courses. Such funding began in 1976. The intent of the policy is to help ensure that off-campus courses are comparable in quality to on-campus courses.

To determine whether this policy has been followed, the auditors examined the teaching history of 76 faculty members who taught off campus in Spring 1979. This number was 16 percent of the 461 university faculty members who taught off campus that semester. They found that 20 of the 76 faculty members, or about one-fourth, did not appear to be in compliance with the policy. These 20 were in the following groups:

1. Eight instructors were full-time faculty members in the Administration of Justice program at Wichita State University. Administration of Justice is a specialty program taught only by Wichita State, and these instructors are located permanently in other parts of the State.
2. Seven instructors were graduate teaching assistants at Kansas State University who were teaching courses at Fort Riley, about 15 miles from the campus, and had never taught on campus.
3. Two instructors were graduate teaching assistants at the University of Kansas who taught only off campus.
4. Three instructors were neither graduate assistants nor instructors in a specialty program. These three had light teaching loads, averaging one course taught off campus in the previous two years.

The Board's policy does not specifically address the issues of faculty members in specialty programs or graduate teaching assistants. Nevertheless, it appears that all 20 of these instructors are in violation of the policy. In addition, the auditors found 13 other instructors whose on-campus teaching, while technically within the requirements of the policy, was limited. In the two-year period, these 13 instructors taught an average of one course on campus and eight courses off campus. Most of these instructors were at Pittsburg State University. The intent of the Board's policy is to ensure greater comparability between on- and off-campus courses by promoting contact with the main campus. These findings would indicate that the policy has weaknesses.

Use of Part-Time Faculty

When part-time faculty are used, particularly in teaching off-campus courses, the need for institutional control becomes even more imperative. The problems found in the amount of contact with the home campus and in the type of evaluation done are compounded when part-time faculty are used. During the most recent North Central accreditation evaluations, four of the State's 19 community colleges were found to have weaknesses in their control of the quality of courses either because of a lack of contact between part-time faculty and full-time faculty or because of a lack of an appropriate evaluation of part-time faculty.

Of the 305 faculty members in the survey, 122, or 40 percent, were part-time. The auditors found a substantial difference in the use of these part-time faculty on and off campus for the courses included in their survey. Nineteen percent of the on-campus courses in the survey were taught by part-time faculty, but 54 percent of the off-campus courses were taught by part-time faculty. It is clear that there was greater reliance on part-time faculty off campus than on campus. The difference was much greater at the community colleges than at the Regents' universities. More than 80 percent of the off-campus courses at community colleges were taught by part-time faculty.

Amount and Type of Work in the Course

The auditors compared the extent and type of work required for the same course on and off campus. In addition to assessing the amount of work and the grading standards, the auditors took into account changes in course requirements due to limitations of the off-campus location. At the Issues in Higher Education Conference concerning off-campus courses, one point on which all participants agreed was that there should be no substantive differences in course or program requirements or in standards for determining performance. The potential for course requirements to vary on and off campus was recognized in one of the North Central accreditation reports of community colleges. The Association recommended that courses follow the same general outline both on and off campus to keep course content as comparable as possible.

To find out if differences between on- and off-campus coursework existed, students who had taken courses on and off campus were asked to compare course requirements and grading standards for the two types of courses. Instructors who had taught the same course on and off campus were also asked to compare the course requirements and to indicate if they had to be altered off campus for any reason.

Student Comparisons of On- and Off-Campus Courses

The students were asked to compare on- and off-campus courses in the amount of reading, the amount of other course assignments, the difficulty of the subject matter, and the extent to which the courses were well integrated. Overall, the community colleges did not fare as well as the Regents' universities. In the four areas of comparison, 20 percent of Regents' university students ranked their off-campus course less demanding and 80 percent ranked it about the same or more demanding. About 52 percent of the community college students ranked their off-campus course less demanding than on-campus courses they had taken and 48 percent ranked it about the same or more demanding. The students were also asked

to compare grading standards off campus and on. Five percent of Regents' students and 20 percent of the community college students said that the standards were lower than those on campus.

Faculty Comparisons of On- and Off-Campus Courses

Whenever the faculty members surveyed indicated that they had taught the same course both on and off campus, they were asked to compare the course requirements and class time for the two locations. There were 153 faculty who fit this category--100 at Regents' universities and 53 at community colleges. About 20 percent of the instructors said course requirements were different on and off campus. Ten percent said requirements had to be altered because of the limitations of library facilities at the off-campus location and 10 percent said the course requirements had to be changed for other reasons. Changes were more prevalent at the community colleges, where 25 percent of the faculty said requirements changed. At the Regents' universities, the figure was 16 percent. The faculty were also asked whether the amount of classroom time was different at the two locations. Approximately 10 percent indicated that the amount of classroom time was less at the off-campus location. The percentage was about the same for the Regents' universities and community colleges.

Amount of Institutional Support

As a final measure of the quality of a course, auditors examined the amount of institutional support available. Institutional support includes student services, libraries, out-of-class availability for consultation with the instructor, supplies, equipment, and other classroom facilities. Providing adequate institutional support is the most difficult aspect of taking education off the main campus to other instructional locations. However, these services, particularly library services, are important to quality education.

Both students and faculty were asked about the adequacy of institutional support. In one area of institutional support, student services, no major problem was found. About 90 percent of the 400 students responding to the survey assessed student services such as advising to be adequate at the off-campus location.

Problems were found in the other areas of institutional support. When asked about the adequacy of supplies, equipment, and other classroom facilities, one-fourth of the Regents' students and almost one-half of the community college students responded that these needs were not being met. About 30 percent of the faculty said audio-visual support was inadequate and 10 percent said other equipment and classroom facilities were inadequate. With regard to the library facilities, 27 percent of Regents' students

and 20 percent of community college students said available facilities were inadequate. Faculty assessment was even stronger; 101 of the off-campus instructors, or 55 percent of those responding to the question, said the library facilities were inadequate. This is significantly different from on-campus instructors' evaluation of libraries on campus, where only 23 percent said libraries were inadequate.

Another area of institutional support which is hard to provide off-campus is out-of-class consultation between faculty and students. The auditors found a great discrepancy between office hours of the on- and off-campus faculty included in the survey. The 120 on-campus instructors who responded averaged 13.6 office hours per week, with only 18 instructors holding one hour or less. The 185 off-campus instructors averaged 3.8 hours, with 76 instructors holding no office hours at all and 33 holding one hour per week. Sixty-eight percent of the off-campus faculty surveyed held one hour or less of out-of-class consultation. There was no significant difference between the Regents' faculty and the community college faculty in this regard. Of the students surveyed, roughly 17 percent indicated that there was inadequate opportunity for out-of-class consultation with faculty.

Need for Additional Control Over the Quality of Off-Campus Courses

The differences the auditors found between on-campus and off-campus courses are inconsistent with the intent of the Legislature in funding off-campus programs. Its intent is that the quality of off-campus courses be the same as on campus. The differences are explained in large part by the way the quality of off-campus education is controlled. At the State level, the Board of Education and Board of Regents, in order to secure quality, appear to rely on the fact that a school is accredited. However, the intervals at which the schools are evaluated are set by the North Central Association and do not account for how quickly off-campus offerings can change. The time between evaluations can range from one to ten years.

The Board of Regents has the statutory authority to provide State-level quality control over the Regents' universities but has not been given the mandate to do so in the specific ways the Legislature has given to the Board of Education. The Board of Regents has not assumed the role of regulator in this matter; it has left control of the quality of courses mainly to the institutions. The auditors found that although the Board of Regents relies on the accreditation process to assure quality, it does not have copies of the accreditation reports, nor does it take an active role in the process. Also, although the State Board of Education is charged by statute with the responsibility of accrediting community colleges and approving courses to receive State credit-hour aid, the Board has no authority to control faculty standards at community colleges.

The one way control over quality is exercised by the Board of Regents is through the budget process. The Board must approve the budget of each

institution and will not allow off-campus courses to be included in the universities' budgets unless the courses are taught by regular faculty. This policy encourages quality but does not control it. The universities may still offer what they wish with non-regular faculty--they just cannot include such courses in the budget. In Spring 1979, 104 of the 827 off-campus courses the Regents' universities offered were not in the budget.

The Legislative Educational Planning Committee has dealt with the issue of quality as a part of its overall planning function. The Committee requested the institutions to develop joint guidelines concerning quality of instruction. The various kinds of institutions differed substantially in what they proposed. As a result, all that was agreed on was a general statement that the opportunity for quality instruction should be maximized. The Committee could not be any more specific with respect to quality concerns without the support of the institutions because it has to rely on voluntary compliance.

Conclusion

Legislative Post Audit's analysis found differences in the quality of on- and off-campus courses. There was no major difference in the qualifications of on and off-campus faculty, but off-campus instructors had considerably less contact with their schools and were evaluated less. Over a third of the off-campus faculty had no significant contact with the home campus. Evaluation of off-campus courses by the institution's administration or by other instructors took place only 27 percent and 13 percent of the time. Twelve percent of the courses had no evaluation. The extensive use of part-time faculty, particularly at the community colleges, compounds the problem.

Students perceived differences in the quality of the courses. A survey of students showed that half of the students taking off-campus courses at community colleges and one-fifth of the students taking off-campus courses at Regents' universities thought their off-campus courses were easier than the courses they had taken on campus. Accreditation reports by the North Central Association of Colleges and Schools provide additional evidence that off-campus courses taught by at least some colleges and universities are not of the same quality as their on-campus courses in regard to the amount and type of coursework offered.

Institutional support such as library resources is likely never to be the same for off-campus and on-campus courses. Institutions must, in planning and developing off-campus pro-

grams, compensate with different approaches to meet these needs. Legislative Post Audit found that sufficient effort has not been made. Students and faculty indicate some inadequacies in supplies, equipment and other classroom facilities. Student services appear, however, to be meeting most student needs. Libraries are by far the greatest challenge to be met at off-campus locations. Over half of the faculty report that this area of institutional support is not being adequately met. There is also criticism from students about library services off campus, particularly from Regents' students who take courses requiring substantial library support.

Students also said the amount of time available for out-of-class consultation with faculty is limited. As one would expect, off-campus faculty hold substantially fewer office hours at off-campus locations than instructors hold on campus. Sixty-eight percent of the off-campus faculty surveyed had one hour or less of out-of-class consultation per week.

The differences between the quality of on- and off-campus courses are inconsistent with the Legislature's intent. The current State policies that are supposed to control the quality of off-campus courses are insufficient in some cases and ineffective in others.

Recommendations

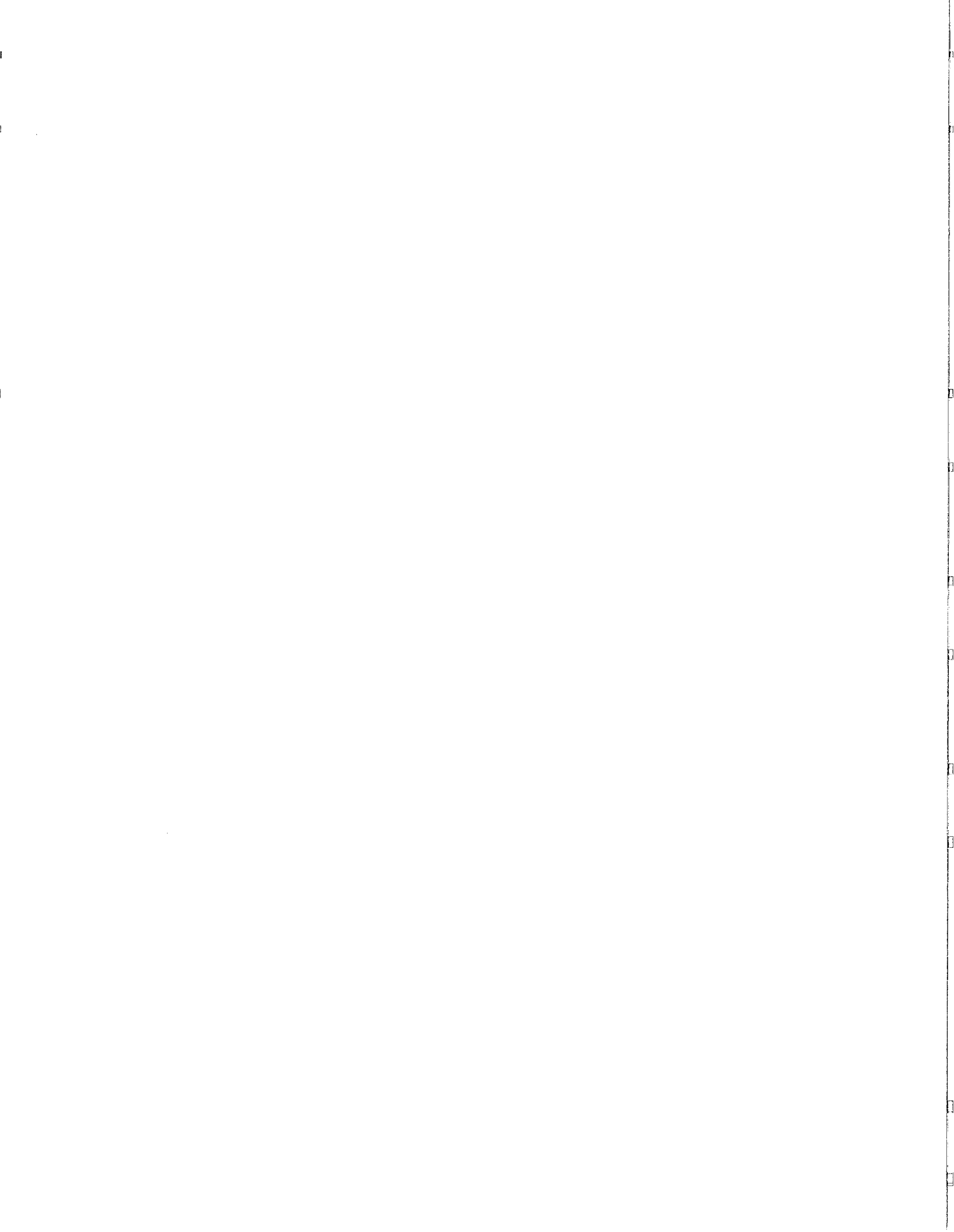
To help meet the Legislature's intent that off-campus instruction be of comparable quality to on-campus instruction, the following actions should be taken:

1. The body designated by the Legislature to control off-campus education in Kansas should develop a detailed set of guidelines to control more carefully the quality of all off-campus courses. The guidelines should include, but not be limited to, the following:
 - a. A procedure to determine that every off-campus location has library services, counseling and advisement, and scheduled office hours for instructors.
 - b. Evaluations of all off-campus courses each semester, both by students and the school. An assessment of the comparability of coursework and grading standards to similar courses on

campus should be included in the school's evaluation.

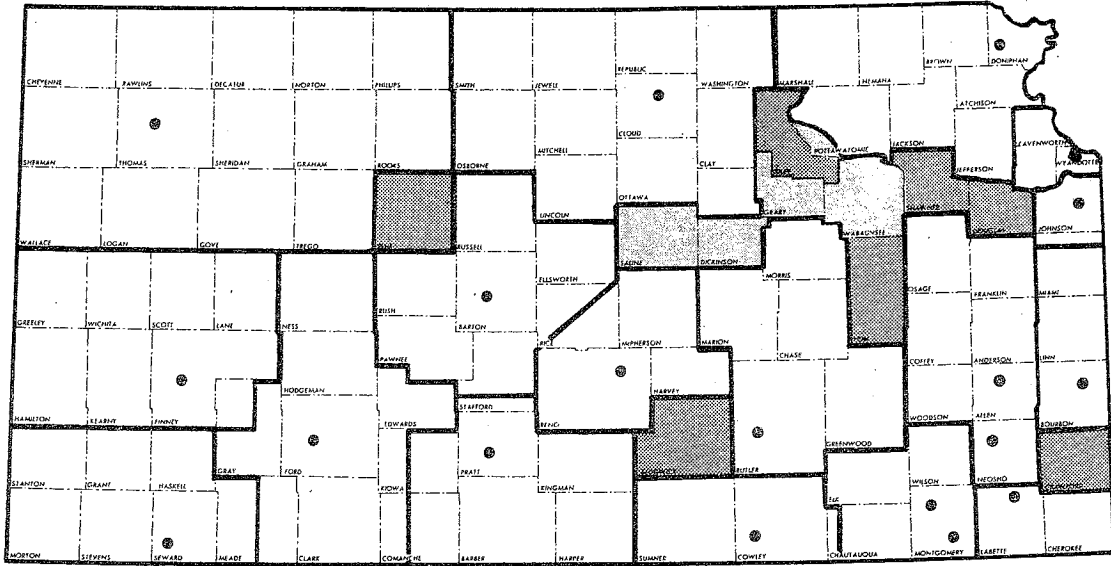
- c. A procedure to determine the comparability of campus contact between off-campus faculty and similar on-campus faculty. Included in the determination should be the number of on-campus faculty meetings and relevant department meetings attended by off-campus faculty and the amount of participation in program planning and development.




Through the course approval process of the State Board of Education and the budget approval process of the State Board of Regents, any off-campus course failing to comply with the guidelines should be denied approval for State funding.

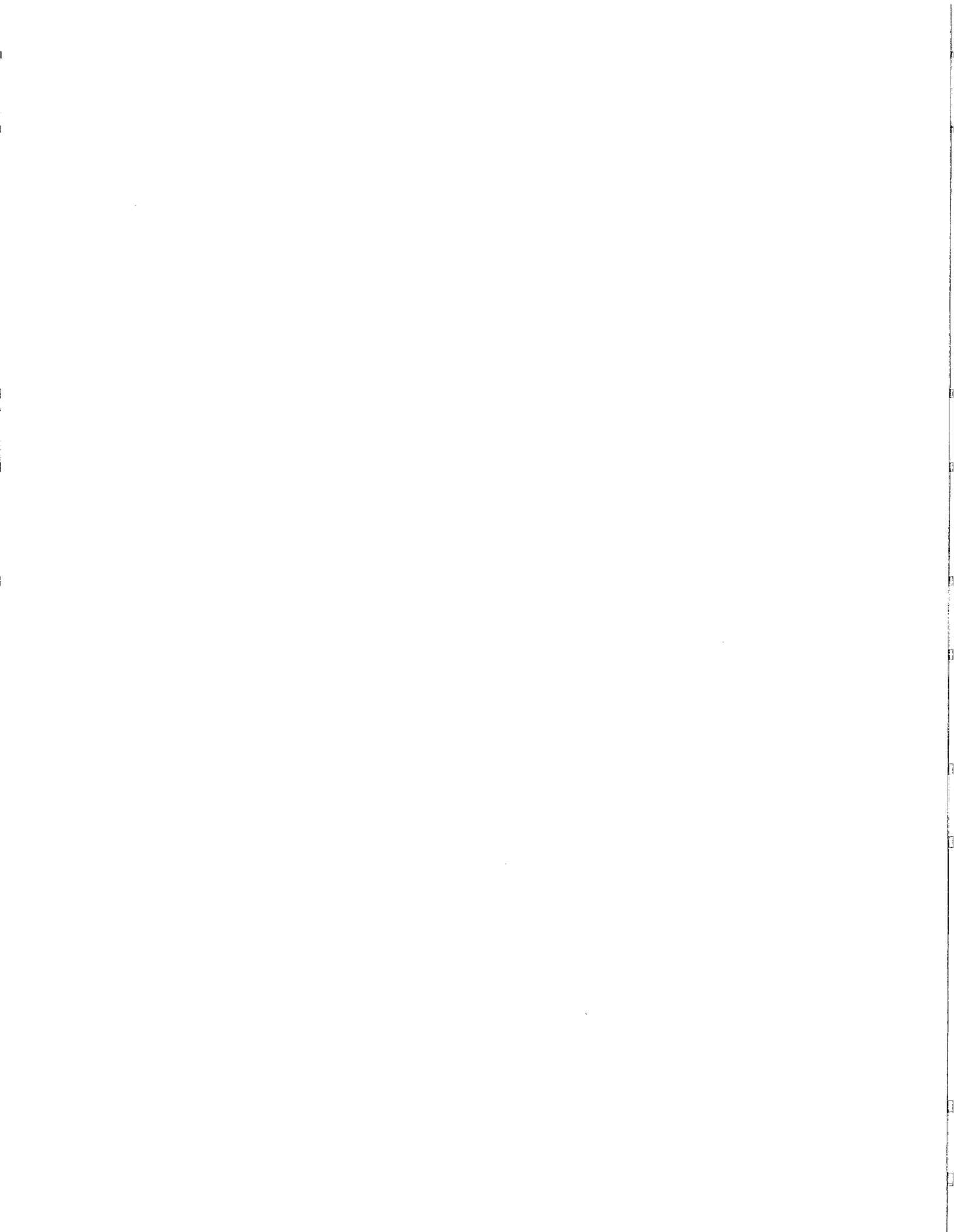


APPENDIX B

Service Areas – Community Colleges



-  County Not In Service Area
-  County With Municipal or Regents' University
-  Community College



APPENDIX C

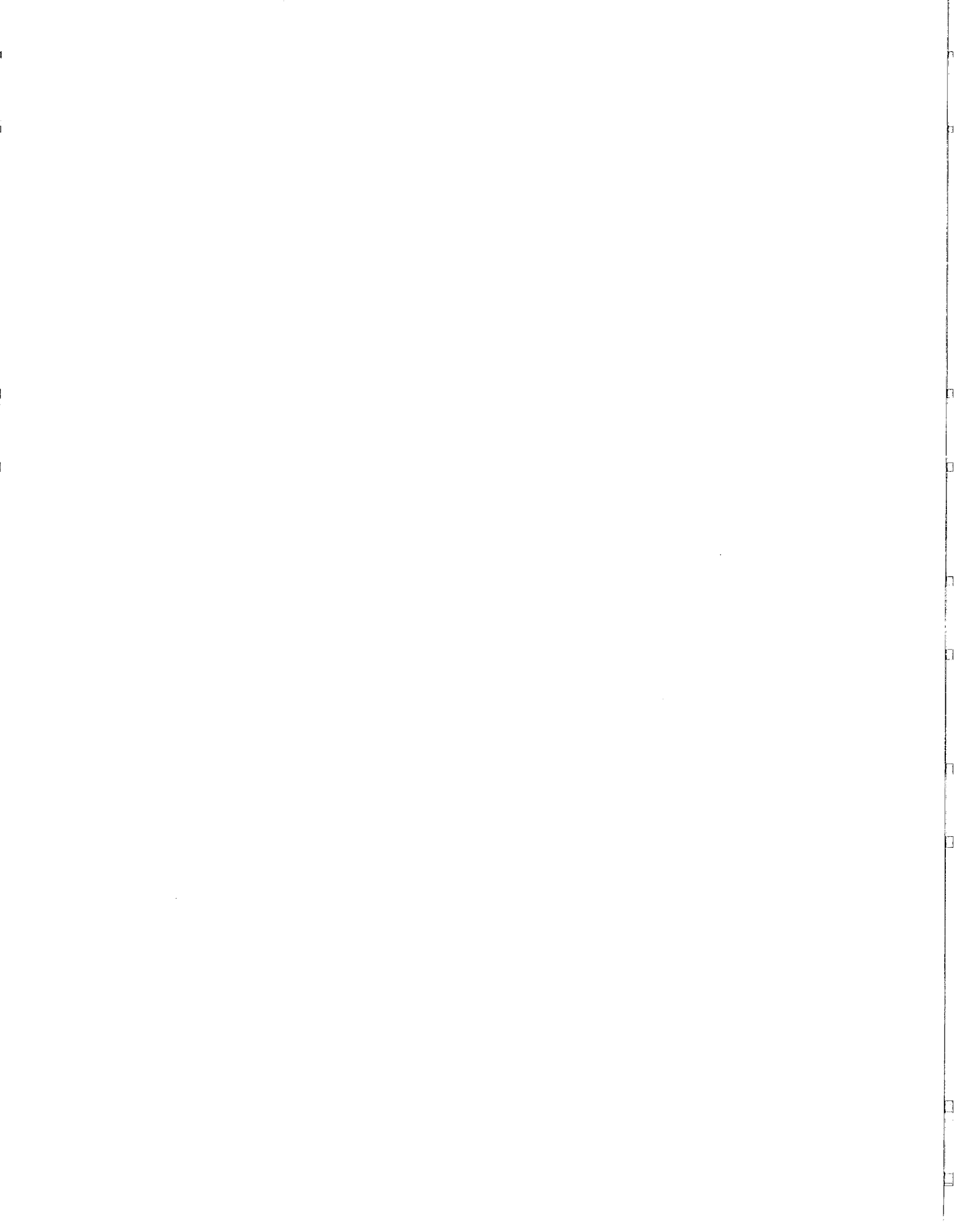
Major Program Areas in Which Off-Campus Courses Were Taught
Spring 1979

	<u>Agri./ Nat. Res.</u>	<u>Archit./ Envir. Design</u>	<u>Area Studies</u>	<u>Biol. Sci.</u>	<u>Bus./ Mgmt.</u>	<u>Communic.</u>	<u>Computer/ Inform. Sciences</u>
<u>Regents' Universities</u>							
Emporia State				7			
Ft. Hays State				1			
Kansas State	15			1	6		8
Pittsburg State							1
University of Kansas		4	1	6	11	1	
Wichita State					3		
<u>Municipal University</u>							
Washburn					2	1	
<u>Community Colleges</u>							
Allen County					1		
Barton County				3	14		
Butler County					3		
Cloud County	1			1	6		
Coffeyville							
Colby	4				20		
Cowley County					2		
Dodge City	10				4		
Fort Scott		2		1			
Garden City				2	3	1	2
Highland				4	8	1	
Hutchinson	4			1	3	1	
Independence				1	1		
Johnson County						2	
Kansas City					6	1	
Labette County				1	1		
Neosho County							
Pratt	2				2		
Seward County					3		
<u>Private Colleges/ Universities</u>							
Benedictine					6		
Kansas Newman					7		
McPherson					2		
Ottawa							
St. Marys				1	9	3	
St. Mary of Plains					1		
Donnelly							
<u>Out-of-State Colleges/Universities</u>							
College of St. Francis							
Columbia College					10		
Laverne College							
Nat. Coll. of Bus.					11	1	
Nat. Coll. of Nat. Med.							
Park College							
U. of Mo. at Columbia							
U. of Mo. at K.C.					3		
U. of South Calif.							
Webster College	—	—	—	—	8	—	—
TOTAL	<u>36</u>	<u>6</u>	<u>1</u>	<u>30</u>	<u>159</u>	<u>12</u>	<u>11</u>

<u>Phys. Educ.</u>	<u>Indust. Arts Educ.</u>	<u>Teacher Educ.</u>	<u>Engin.</u>	<u>Fine/ Applied Arts</u>	<u>Foreign Lang.</u>	<u>Health Prof.</u>	<u>Home Econ.</u>	<u>Law</u>	<u>Letters</u>	<u>Library Sciences</u>	<u>Math</u>
1		56					1		1	5	
		42		1		8			2		
	2	95	3				51		13		3
1	25	10							1	2	
1		70	7	2	12	1			11		
	3	31		1					5		
						1					
									1		
1				5					4		
17	17	1		27			3		12	2	1
1	2	1		9	1				11	12	
6		1		28			7		5		1
10				1							
18				21	3				9		2
5	8			15	1		1		3		
4				4		1	1		3		2
				7			2		3		2
4	7			19	3		1		2		1
		4		4			1		17		3
48				1	1				39		3
	2	1		7			1	1	4		2
6				15							3
				1					1		1
	3	1		1					5		1
	6			1					1		1
3		1		14					4		
4				7	4		2		1		
					1				3		1
		1									
		2							2		
				1					4		2
		11							3		1
						9					
						12					
							1				
									1		
								2	3		5
						4					
									2		1
										2	
<u>130</u>	<u>75</u>	<u>328</u>	<u>10</u>	<u>192</u>	<u>26</u>	<u>37</u>	<u>71</u>	<u>3</u>	<u>176</u>	<u>23</u>	<u>37</u>

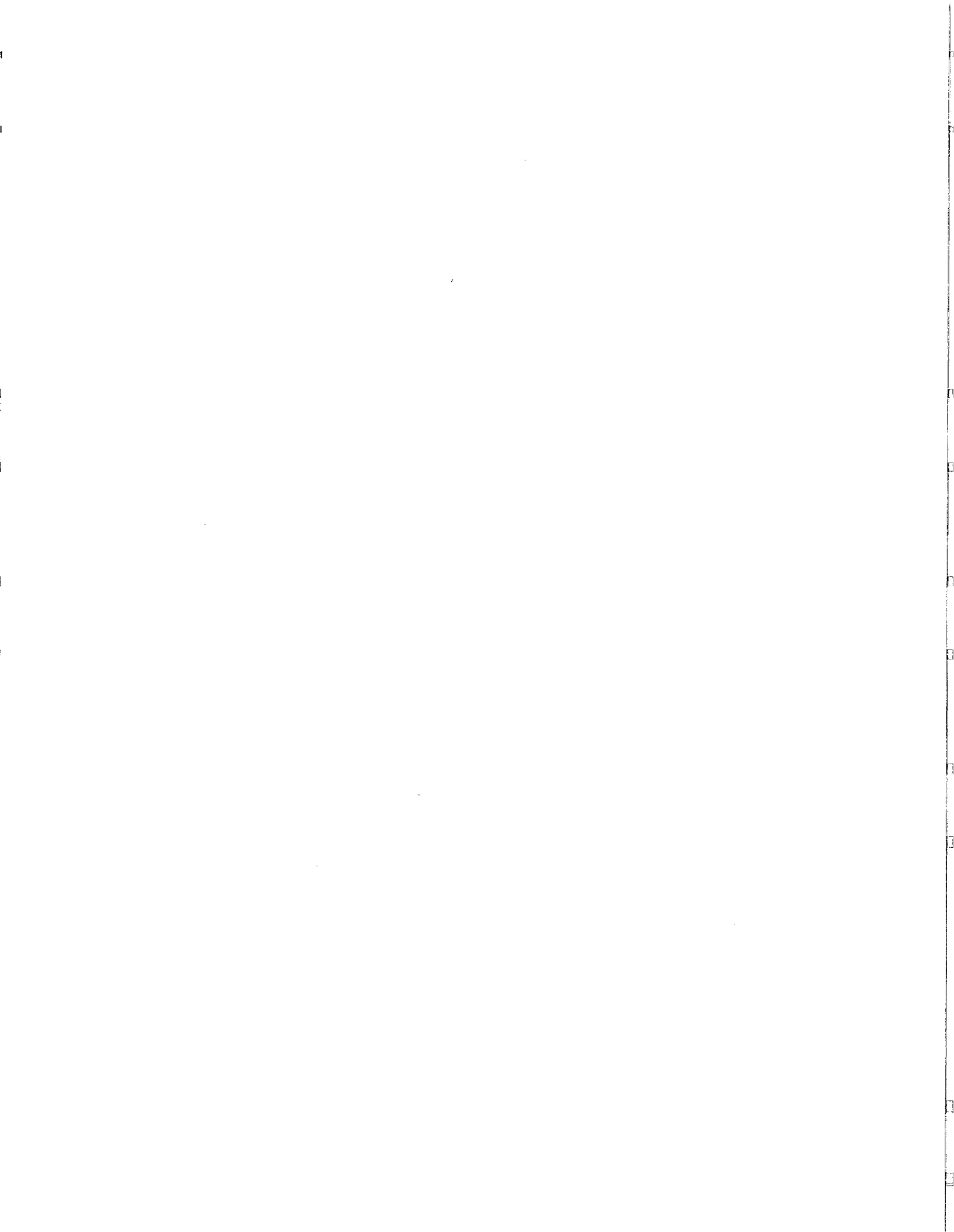
	<u>Military Sciences</u>	<u>Physical Sciences</u>	<u>Psychol.</u>	<u>Public Affairs/ Services</u>	<u>Social Sciences</u>	<u>Theology</u>
<u>Regents' Universities</u>						
Emporia State		3	32		3	
Ft. Hays State		2	1		4	
Kansas State			3		19	
Pittsburg State			10		1	
University of Kansas		2	15	40	44	
Wichita State				107	2	
<u>Municipal University</u>						
Washburn						
<u>Community Colleges</u>						
Allen County			7			
Barton County		4	4		4	
Butler County		2	6		8	
Cloud County			1		2	
Coffeyville						
Colby		2	8		4	
Cowley County			1		1	
Dodge City						
Fort Scott			4		4	
Garden City			2		1	
Highland			7		11	
Hutchinson			5		15	1
Independence			2		1	
Johnson County						
Kansas City			1		2	
Labette County			1		1	
Neosho County			2		1	
Pratt			1		1	
Seward County		1	4		1	
<u>Private Colleges/ Universities</u>						
Benedictine					1	
Kansas Newman					3	
McPherson					1	
Ottawa			4			
St. Marys		1	2	2	9	1
St. Mary of Plains					1	
Donnelly						
<u>Out-of-State Colleges/Universities</u>						
College of St. Francis						
Columbia College			2		4	
Laverne College				1		
Nat. Coll. of Bus.					5	
Nat. Coll. of Nat. Med.						
Park College				6		
U. of Mo. at Columbia						
U. of Mo. at K.C.				1		
U. of South Calif.						
Webster College				8		
TOTAL	<u>-0-</u>	<u>17</u>	<u>125</u>	<u>165</u>	<u>154</u>	<u>2</u>

<u>Interdis.</u> <u>Studies</u>	<u>Bus./</u> <u>Commer.</u> <u>Tech.</u>	<u>Data</u> <u>Process.</u> <u>Tech.</u>	<u>Health</u> <u>Services</u> <u>Tech.</u>	<u>Mech./</u> <u>Engin.</u> <u>Tech.</u>	<u>Natural</u> <u>Sciences</u> <u>Tech.</u>	<u>Public</u> <u>Services</u> <u>Tech.</u>	<u>TOTAL</u>
							109
							61
2							221
							51
3							231
2							154
			8				13
	4			3		1	26
	2		6				117
						4	60
	1			12			72
							11
	2		1	2	2		98
	2		4	2			45
	1			1			31
	5	1	15	17			63
			2	1	1	1	53
			2				62
			1	1	3		127
				6			29
							26
							13
				1			16
							14
				9			38
	2						29
							12
							11
							6
4							10
							35
							26
							12
							1
							17
							1
1							28
							4
1							10
							2
							4
4							4
							16
<u>17</u>	<u>19</u>	<u>1</u>	<u>39</u>	<u>55</u>	<u>6</u>	<u>6</u>	<u>1,969</u>



APPENDIX D

Agency Responses





Board of Regents - State of Kansas

Suite 1416 Merchants National Bank Tower
Topeka, Kansas 66612 (913) 296-3421

August 18, 1980

Dr. Richard E. Brown
Legislative Post Auditor
State of Kansas
Mills Building
Topeka, Kansas 66612

Dear Dr. Brown:

We have received your letter of July 28, 1980, and the draft report, OFF-CAMPUS EDUCATION IN KANSAS, by the Legislative Division of Post Audit. We also received, a few days later, the SUPPLEMENT TO THE PERFORMANCE AUDIT OF OFF-CAMPUS EDUCATION IN KANSAS (OFF-CAMPUS COURSE INVENTORY). We appreciate your sending these documents to us for review before their presentation to the Legislative Post Audit Committee which, we understand, is scheduled for September 5.

It is obvious that you and your staff have devoted hundreds of hours of research and study to this audit. We appreciate the thoroughness of your effort to present a comprehensive picture of off-campus postsecondary education in Kansas.

Since off-campus courses have become such an important part of the educational programs of so many Kansans, we undoubtedly will be reviewing various aspects of your report throughout the academic year which is just now beginning. In order to put some of our immediate reactions on record in time for the September 5 meeting, however, I will give you a few comments in this letter. I should point out, also, that the Board of Regents has not had a meeting since the completion of your draft report; thus my comments are sent to you without benefit of full Board discussion.

In general, I feel that the report will be helpful to us in our management of the off-campus programs of the Regents institutions. Your analysis of what you perceive as duplication, your concern for the maintenance of high quality, and your desire to maximize efficiency through coordination of the various segments of post-secondary education are elements of this audit which will retain our sincere attention during the months ahead. We look forward to working with the appropriate legislative committees which will consider these matters during the 1981 session of the Kansas Legislature.

First, a few comments concerning duplication of courses: As you pointed out in the report, it is very difficult to make a single, foolproof definition of duplication. More specifically, it is difficult to make a satisfactory definition of undesirable duplication. Your auditors adopted the following definition: two or more courses that either are identical or are part of the same program and that are being offered at locations within 20 miles of each other. We think that definition is too broad. Applying the same definition to the Johnson-Wyandotte County area and to Western Kansas ignores population density, traffic problems and many other factors relating to possible duplication. We agree, however, that with that definition it is possible to produce a list of courses and situations which merit scrutiny by the responsible bodies. For example, the Post Audit definition lumps the following six Kansas University courses as "program duplication": Education and Culture in America-1607 to the Present, History of Mexico, Modern Germany-1871 to the Present, Golden Age of Greece, US-Panama Relations, and The Thesis in History. While these six courses obviously are not duplicates, we agree that it is worthwhile to review their relationship with each other and with other courses in the same general program in the same general area.

A second example indicates the following four courses were "duplicative" in Leavenworth: Social Problems and America, Social Deviation, Introduction to Social Research, and Principles of Sociology. A final example of three courses listed as "duplicative" in Topeka: Social and Cultural History of the Great Plains, History of American Childhood, and Recent World History.

Even the more limited category of identical course duplication is not as simple as it may appear. For example, of the eight Regents courses listed in the audit as identical course duplication, two are KSU courses offered at Fort Riley, duplicated at Army request because of military schedules; two are KU courses in Western Civilization offered at Shawnee Mission, duplicated because "Western Civ" is a seminar-discussion course which cannot effectively accommodate more than eight students in one class; two are WSU courses at Derby which duplicate courses offered on campus in Wichita; and two are Administration of Justice seminars in Leavenworth which are entirely different courses, one being a graduate seminar and one undergraduate. The two courses in Derby, one with an enrollment of 22 and one with 25, raise the question, "Is it better to transport two Wichita instructors to Derby or 47 Derby students to Wichita?" Thus it becomes obvious that even the most simple and obvious cases of course duplication should not be accepted per se as undesirable. I state again, however, that in general we agree that all evidence of apparent duplication merits review and re-study of each situation.

Legislative Post Audit response. There is some misinterpretation on the Board's part of the audit's definition of duplication. The six history courses taught by the University of Kansas in the Kansas City area were part of the duplication occurring there not because the University was offering six courses in the same program but because those courses were duplicating with Mid-America Nazarene College's on-campus history program, an off-campus course taught by St. Mary College in Kansas City, St. Mary's on-campus history program, a history course taught by the National College of Business, and a history course taught by Emporia State University. In the examples of identical course duplication the Board cites, the Administration of Justice seminars taught in Leavenworth were not duplicating each other but, rather, law enforcement courses taught by Park College in Leavenworth. The Wichita State accounting course taught at Derby was duplicating an accounting course taught by Columbia College in Wichita. These particular examples point out a number of duplications between courses offered by public and private schools. Most of the time, however, duplication involved courses taught by public colleges and universities.

You requested that we respond directly to each of the specific recommendations in the audit report. The report's first recommendation (on page 26 of the draft) states that the Board of Regents and the State Department of Education should develop a clear and workable definition of "hobby and recreational courses" and submit the definition to the Legislative Educational Planning Committee for review. The Board of Regents will certainly cooperate in this effort with the State Department of Education to produce a mutually acceptable definition. It is pertinent to note, however, that of 37 Regents courses cited as potential hobby/recreational program areas, 30 are courses to train and certify vocational-technical teachers. Of the remaining seven courses, six are graduate level and only one is a sophomore level Fine Arts class. In our opinion, none of the Regents off-campus courses can be fairly classified as hobby or recreational.

Legislative Post Audit response. The audit report (page 19) notes that 30 of the 37 courses taught by Regents' institutions are courses for vocational education teachers. As the report points out, the problem with the existing policy and definition is centered on the community colleges.

The second set of recommendations, concluding the chapter on duplication, are directed to the Legislature and a body to be designated by the Legislature to coordinate statewide off-campus education. The Board of Regents is prepared to work cooperatively

and willingly with any legislative committee empowered to address the recommendations. The staff of the Board of Regents will provide any needed information and any appropriate assistance to the legislative committee charged with studying the recommendations.

The Board of Regents already has addressed for the Regents institutions most of the recommendations stated on page 41 of the draft report:

- 1-a. - Regional Service Areas: The geographic jurisdiction areas provided in Appendix A respond to the recommendation and include the criteria listed. The support services, including library resources and advising, have been a major concern and will continue to be stressed.
- 1-b. and 3. - Specified off-campus locations, preferably one per county: A review of locations at which courses were offered in the Spring semester, 1979, indicates that Regents courses were offered in only one community in each county for 50 counties. In 12 counties courses were offered in two communities, and in five counties courses were offered in three or more communities. The last group of counties were highly populated areas.
- 1-c. - Courses should not be offered within 20 miles of the home campus: Typically, courses are not offered within 20 miles of the Regents home campuses. Exceptions are the City of Wichita and Ft. Riley. If a course is offered within a 20-mile radius, it is because students are already centered at or near the location (for example, a school district inservice course). It is more energy efficient and cost efficient to transport one instructor than 15 or 20 students. In Sedgwick County, for example, there are many locations where it is advantageous to move the instructor rather than the students.

Legislative Post Audit response. These recommendations call for more coordination between Regents' institutions and community colleges than now exists under the separate policies of the universities and colleges. The recommendations call for regional service areas that encompass all postsecondary institutions in the vicinity. The Regents' geographic jurisdiction areas take into account only Regents' institutions. The locations of Regents' courses do not take into account the location of community college courses.

There are indeed cases in which it is desirable to teach a course within 20 miles of a campus, as the response points out.

Under the recommendations, the designated body would evaluate such cases and approve exceptions to the policy. As the audit points out, the main problem the auditors found in this regard was the offering of multiple sections of the same course by community colleges at locations within 20 miles of the campus. In many of these cases, reasons for legitimate exceptions--such as the availability of specialized resources at the off-campus location or the tailoring of a class to people at a set location like a hospital or school--did not appear to be present.

- 1-d. - Control of out-of-state institutions offering courses in Kansas: In the period since KSA 1979 Supp. 74-3251 was enacted, general course offerings from out-of-state institutions have been reduced. In fact, except for the National College of Business operating in Shawnee Mission, most of the out-of-state institutions are offering courses only to a selected and closed clientele. The College of Naturopathic Medicine operating with Kansas Newman in Wichita is an example. We cannot be certain that the reduced general course offerings are a direct result of the registration law; however, the law and the reduction of courses do appear to have a cause-and-effect relationship. We do not see an urgent need for greater control at this time, but on the other hand we would not oppose such legislation.

Legislative Post Audit response. This recommendation was made to help the Board of Regents ensure that any education provided by out-of-State institutions is of comparable quality to that offered by in-State institutions. Having approval power would ensure that the Board has sufficient authority to question and approve or disapprove the content of courses taught by out-of-State institutions.

The recommendations at the conclusion of the Chapter on Off-Campus Course Quality are addressed to the body designated by the Legislature to control off-campus education. Again, the Board of Regents is prepared to work cooperatively with the Legislature as the control body is being established and in developing the guidelines recommended relating to course quality.

The Board of Regents supports Recommendation 1-a (page 51 of the draft) and is equally concerned that library services at each course location should be adequate and that office hours should be available for student contact with the instructor. The Board has been working diligently on this matter and notes that the negative student responses in the last Post Audit study are reduced

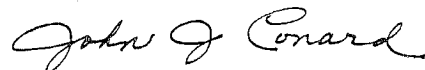
from those received from a survey of student attitudes done by the Board in 1976. At that time 45 percent of students enrolled in off-campus courses from Regents institutions perceived that library services were inadequate and 52 percent viewed counseling and advising services as too limited.

Recommendation 1-b is also supported by the Board of Regents and evaluations of courses on and off the campus are encouraged.

Comparability of campus contact between on and off-campus instructors has not been an assessment factor for the Board, since the vast majority of Regents off-campus courses are taught by regular faculty instructors. The Board of Regents recognizes the importance of strong campus contact for the off-campus instructor, however, and will plan to incorporate it into future evaluation efforts.

Again, thanks for giving us the opportunity to comment on the audit report. We will continue to review the report and its implications during the months ahead, and we look forward to working with the appropriate legislative committees in considering proposals for some implementing legislation.

Sincerely yours,



John J. Conard
Executive Officer

cc: Members, Board of Regents
Members, Council of Presidents

Kansas State Department of Education

Kansas State Education Building

120 East 10th Street Topeka, Kansas 66612

August 18, 1980

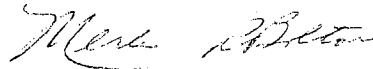
Dr. Richard E. Brown
Post Auditor
Legislative Division of
Post Audit
109 West 9th Street, Suite 301
Mills Building
Topeka, KS 66612

Dear Dr. Brown:

Members of my staff and I appreciate the Legislative Division of Post Audit providing the State Department of Education the opportunity to review the draft copy of the audit report on Off Campus Education in Kansas. I would also like to thank you for providing additional copies for the Kansas State Board of Education and the nineteen community college presidents. The response enclosed has been prepared in cooperation with the community college presidents. The Kansas State Board of Education will review the audit report and response at its September meeting.

Staff members from the State Department of Education would be willing to review our responses to the draft copy of the audit report if your staff would find it helpful.

Sincerely,



Merle R. Bolton
Commissioner of Education

MRB:SN:pm

Enclosure

The audit report completed by the Legislative Post Audit Division clearly indicates the progress made in improving off campus programs by the higher education institutions of Kansas and the agencies which supervise them. Credit should also be given to the Legislative Education Planning Commission for their assistance and guidance in developing the cooperative extension course guidelines. Though, as the report notes, complete agreement was not reached on the method for insuring quality instruction or avoiding duplication, the audit report indicates that quality has been maintained in the area of community college faculty and does not show direct duplication between the Regents Institutions and community colleges for extension locations. Furthermore, the Department of Education is operating in compliance with the cooperative guidelines adopted by the Associated Independent Colleges of Kansas and the staff of the Board of Regents.

Response to Recommendation Number 1, page 26

The staff from the Department of Education will be pleased to work with their colleagues from the Board of Regents in order to refine a definition as to what courses are hobby and recreational. The Department of Education recognized early the potential problems concerning state funding of certain types of courses. As a result, a definition of hobby/recreational courses was developed and the State Board of Education took official action not to fund such courses. Hobby/recreation/interest courses are defined as those courses which are designed and offered largely as a leisure type activity. Courses referred to in this definition do not normally fit into a regular college curriculum. It should be recognized, however, that the questions raised by the audit report are not due to a vague definition of hobby or recreational courses. The questions raised center on the intent of the student taking the courses. If student intent is a criteria for paying state funds, then, a major revision on paying

state monies for public higher education will be required. Whether at a community college or a Regents Institution, students take college course work for a wide variety of reasons. It is the opinion of the State Department of Education that if the course is an approved (outdistrict) course and will apply to a valid educational program, state aid should be given.

Legislative Post Audit response. Legislative Post Audit disagrees with the Department's statements. The problem is one of a vague definition that needs to be sharpened. In the absence of a clear definition, the auditors turned to student intent as the next best measure. The student's responses show that, in their minds at least, the courses are recreational in nature.

There is a further problem with the Department's position in that it appears to contradict the Board of Education's own policy regarding recreational courses. Effective July 1, 1980, physical education courses offered outside a community college's district will not receive State funding even if they are a part of a "valid educational program." Such a policy appears to concede that courses should not be extended everywhere just because they are a part of an approved program. Further, the Legislature has clearly stated that out-district courses that are hobby and recreational in nature should not receive State support.

Legislative Post Audit continues to believe that courses should be evaluated on the basis of a clear definition of what constitutes "hobby and recreational." Such a definition should be extended to industrial arts and fine arts courses. The present Board policy does not address these courses, but the audit found that many of the courses may well be recreational.

Response to Recommendation Number 1, page 41

Realizing the potential problems with duplication of services by community colleges, the State Board of Education acted in 1977 to establish the first service area concept. The Board recognized the need for a planned and organized off campus program for the community college system. It would seem difficult if not impossible to develop a statewide service area, as proposed in the audit report, considering the differing missions of the Regents institutions and the

community colleges. The community colleges are by nature local or regional institutions and their mission, as reflected in the State Plan, indicates this local or regional commitment. Regents institutions, however, are state institutions and as such have a mission to serve the state's residents, a far broader definition. Considering the differing missions of the two types of institutions, the State Board of Education is in full support of the current service area concept for community colleges.

The Department of Education, on its own initiative, pioneered the service area concept and governs the community colleges under its jurisdiction within this concept. By State Board policy, all out-district courses approved for state funding must carry resident credit, fully applicable to full academic or vocational degree programs.

Legislative Post Audit response. The Department does not agree with the recommendation calling for regional service areas and may have misunderstood the intent of the recommendation. The recommendation does not call for a "State-wide service area"; it calls for regional service areas that encompass all postsecondary institutions in the vicinity. This would not conflict with the differing missions of the institutions but would enhance them. It also would ensure cooperation among schools and would provide a more complete, coordinated off-campus program for students.

The Kansas Department of Education has recently conducted a followup of the service areas established in 1978 and this followup includes a population study. While the Post Audit study proposes permanent locations for each college to

offer courses, this seems to State Department staff to be an excessively arbitrary method, assuming that colleges are to meet the educational needs of the people. If a community college has within its service area one location or three within a county, the cost in state dollars is exactly the same since state monies are actually paid on credit hours earned. In the opinion of the Department of Education, the community colleges should take the educational opportunities to the citizens within their approved service areas.

Major Positions Taken By The State Board of Education On Off Campus Education

1973--Off Campus Education

First authorized by the legislature for community colleges.

1973--Rules and Regulations

Adopted by the State Board of Education for out-district offerings.

1977--State Board position not

to fund hobby/recreation courses.

Legislative Post Audit response. Legislative Post Audit disagrees that the cost in State dollars is exactly the same if a community college has one or three locations within a county. Operating expenses, particularly for faculty salaries, rent, and travel, will likely increase as the number of locations increases. State aid is given to the community colleges to relieve some of the local burden for providing postsecondary education. If local costs increase, the need for State support increases. Also, the Department's argument does not take into consideration the additional problems in controlling course quality that occur as the number of locations grows. For example, with fewer locations, the community colleges could provide more complete support services. Setting sites for off-campus education will still allow the community colleges to take educational opportunities to the citizens.

Response to Recommendation Number 2, page 42

The Kansas State Board of Education and the presidents of the 19 community colleges are

1977--State Board adopts off campus guidelines

opposed to placing the governance of off campus education with another agency, thereby splitting the control of community colleges. The State Board has consistently worked together with the community colleges and the Legislative Education Planning Commission to improve and govern the off campus offerings at the community colleges. Unnecessary duplication of off campus offerings by community colleges was emphasized by the Post Audit study utilizing a formula dating from 1975 which, due to

developed in cooperation with Board of Regents Staff and associated independent colleges.

1978--Service Area Concept Approved for all Kansas community colleges by the State Board.

1980--No out-district physical education courses offered for state funding after July 1, 1980.

increasing energy costs is now no longer valid. Therefore, the State Board of Education should continue to work with the entire community college instructional program in cooperation with the Legislative Education Planning Commission, and in coordination with the Kansas Board of Regents. There is an inherent danger in placing off campus programs in a class, a category by itself, and governing them by a different set of standards or a different agency. The State Board of Education has taken the position that off campus courses should be taught by faculty, selected with the same criteria as the on campus faculty. In addition, all courses taught out-district, which are approved by the State Board of Education, must be applicable to academic or vocational programs on campus. The State Board of Education regards off campus instruction as an integral part of the overall college program and feels that it should be monitored and evaluated by the same governing agency, the State Board of Education.

Legislative Post Audit response. The audit recommendations provide a way to alleviate conflicts and problems in the present off-campus system in such matters as duplicated courses and programs, support services such as libraries, and assessment of off-campus faculty. Resolving these problems by centralizing regulation of off-campus education may potentially cause conflict in that the off-campus program would be regulated by one governing board and the on-campus program would be regulated by two. These conflicts would need to be kept in mind as the role of the board was developed. Legislative Post Audit believes, however, that the conflicts which could result from implementation of the audit recommendations are certainly manageable in comparison to the alternative of taking no action and allowing the problems to continue.

Response to Recommendation Number 3, page 42

Utilizing a 1975 study done by the Kansas Board of Regents, the Post Audit Study defines duplication as similar courses offered within a 20 mile radius. The Department of Education would assert that while this study was valid for 1975, with fuel costs doubling, the twenty mile figure is no longer valid. Students, due to current energy costs, want the courses held as close as possible to their communities. With both the United States government and the State of Kansas urging energy conservation, it is much more logical to send three instructors to three attendance centers to conduct approved courses than to have thirty students drive to one attendance center. Furthermore, direct duplication between community colleges and Regents institutions is unlikely since the Regents System seldom offers lower division undergraduate courses off campus.

Legislative Post Audit response. The findings of the 1975 study still appear to be valid. Legislative Post Audit's survey of students in Winter 1979-1980 showed that students were willing to travel an average of 20 miles to take a course. Of the 328 students who responded, 123 (37.5 percent) said they were willing to travel more than 20 miles. Legislative Post Audit used a variety of sources and took a number of factors into considera-

tion before arriving at its definition of duplication. (See audit report, pages 27-28.) The 1975 study was only one source. Set locations will still make off-campus education accessible. In addition, it will provide more complete, coordinated programs and will make the control of course quality more manageable.

Response to Recommendation Number 1, page 51

The State Board of Education, the body recognized by the legislature as the controlling agency over community colleges, is willing to do an in-depth study concerning the availability of full student services to all off campus students. The study will also include the methodology utilized by the 19 community colleges for maintaining contact with the part-time or off campus faculty. In addition, the extent of institutional evaluation and student evaluation of off campus courses will be ascertained. The results of this study will be presented to the Legislative Education Planning Commission in the spring of 1981.

The Department of Education recognizes the validity of evaluations each semester of courses, both on and off campus. Furthermore, continual contact between full-time and part-time faculty is crucial for the maintenance of continuity of an educational program. Most of the community colleges already have excellent systems to monitor both items. To ascertain if a problem does exist, a full study should be made and delivered to the Legislative Education Planning Commission. The Department of Education is also firmly convinced that full student services must be as accessible as is reasonably possible to all community college students. North Central and State accreditations have not stated that these services are not being offered, only that they might be improved. The status of student services could be provided to the Legislative Planning Commission if this is the desire of the Committee.

**LEGISLATIVE DIVISION OF POST AUDIT
PERFORMANCE AUDITS ISSUED**

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(March 1977)

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EDUCATION

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HEALTH AND WELFARE

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Board of Social Work Examiners (November 1978)
Board of Examiners of Psychologists (November 1978)
Board of Examiners in Fitting and Dispensing of Hearing Aids (November 1978)
Department of Health and Environment: Food Service Regulatory Program (September 1979)
Department of Health and Environment: Adult Care Home Regulatory Program (November 1979)
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