



SCHOOL OF LAW

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DATE: February 20, 2013

TO: Martin Snider
Chair, Graduate Studies Committee
CWRU Faculty Senate

FROM: Lawrence E. Mitchell
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RE: Proposal for on-line Delivery of Previously Approved
LL.M. in International Business Law

I am writing to express my strong endorsement of the proposal for the on-line LL.M. in International Business Law. This proposal has been unanimously approved by the Faculty of Law on December 6, 2012.

Again, I wholeheartedly support this and I think it will be a great program for our School of Law.

Please let me know if you have any questions, or if I can provide any additional information.

**Case Western Reserve University
School of Law**

**Proposal for on-line Delivery of Previously Approved
LL.M. in International Business Law**

February 20, 2013

Contact person: Dale Nance, dale.nance@case.edu

On-line delivery approved unanimously by the Faculty of Law on December 6, 2012

Overview

The “LL.M.” degree is an advanced law degree for students who have obtained the basic professional law degree (usually called an LL.B. or a J.D., but there is considerable variation among countries). In 1992, CWRU established an LL.M. Program in United States Legal Studies. In 2004, to reflect changes in the LL.M. curriculum, the name of the program was changed to "The Master of Laws in United States and Global Legal Studies." The program received American Bar Association acquiescence in August 1992. The law school enrolled its first candidates for the LL.M. in U.S. Legal Studies in the fall of 1992. At the time, CWRU was one of a handful of American law schools offering an LL.M. program only for foreign students, and the first in Ohio. In 2008, the law school launched a specialized LL.M. degree program in International Criminal Law for foreign as well as U.S. trained lawyers. In 2009, two additional, more specialized LL.M. degree programs, directed exclusively at foreign law graduates, were created at CWRU: the LL.M. in International Business Law and the LL.M. in Intellectual Property. All four LL.M. degree programs are one-year programs, as are most residential LL.M. programs offered in this country.

The LL.M. program launched in the fall of 1992 with just three students, one from each of Belarus, France, and the Philippines. The program grew steadily each year. The two principal feeder countries in the early years were Saudi Arabia and Thailand. Since the events of September 11, 2001, the LL.M. class has changed considerably in terms of source countries; the principal feeder countries are now China, Taiwan, and Thailand. There are currently 82 students in the four LL.M. programs combined. Our LL.M. graduates are law professors, judges, prosecutors, legislators, partners in international law firms, corporate legal counsel, and lawyers employed in government ministries all over the world. For example, in 2000, eight of the forty lawyers in the Bangkok office of Baker and McKenzie were CWRU LL.M. graduates.

More than 75 U.S. law schools compete for foreign law graduates as LL.M. students, so far mostly in residential programs. CWRU has maintained a competitive edge by capitalizing on the strengths of the law school curriculum and certain core values on which the LL.M. program has been grounded: integration into the American law school experience, preparedness for the global economy, and a welcoming atmosphere.

But the competition is now expanding to non-residential programs. In part because of the rather dramatic downturn in the market for U.S. law graduates in recent years, many law schools are looking for alternative revenue sources, and one relatively untapped source is the market for advanced American legal education for foreign students who cannot or do not wish to travel to the United States in order to attend classes. Unlike students who come to the U.S. for graduate legal studies, many foreign students may have no intention of practicing law in the U.S. This means that residence requirements, which many states impose

on those who wish to take American bar examinations, become irrelevant. That opens up the possibility of providing legal education to foreign students by means other than requiring those students to attend classes in the U.S.

The present proposal is to adapt and offer our current LL.M. in International Business Law to these students using a different delivery system: entirely on-line education. On-line programs are burgeoning, with numerous universities, and law schools in particular, offering on-line LL.M. degrees. However, we are aware of no law school that has yet offered an on-line LL.M. in International Business Law. For foreign law graduates who are not planning to practice in the U.S. but will likely do business with firms from the United States, an LL.M. in international business from an American perspective is likely to be a very useful supplementary credential that can advance their careers.

1. Degree Program & Rationale

The existing degree program is a “Master of Laws in International Business Law.” The residential LL.M. in International Business Law is designed to give foreign lawyers an opportunity to study United States business law as applied in international transactions. The one-year program, which begins in the Fall semester only, requires full-time attendance. It immerses students in academic analysis and practical applications of United States business law to entities doing business both within and outside the United States.

The proposed on-line version of the LL.M. in International Business Law will serve essentially the same purposes, but it will be delivered on-line without a residence requirement. Like the resident LL.M. program, the on-line program will prepare foreign lawyers for positions in international law firms, in-house legal departments of multinational enterprises, government posts, and other for-profit and non-profit organizations doing business internationally. It will combine an academic approach to international business, including study of policy rationales underlying legal regimes, with a practical orientation to day-to-day problem-solving.

The program is a potential source of substantial revenue. Beyond that, like the graduates of our residential LL.M. programs, our on-line program graduates will become resources as we expand our international programs in the future and spread the global reputation of the university as a whole. These graduates help us establish contacts in order to bring the full breadth of international scholarship to our faculty and to identify foreign faculty and students who can enrich our programs at all levels.

Finally, as our faculty gain sophistication in the tools of on-line education, we anticipate spill over benefits for the regular J.D. program. Not the least of these will be the faculty members’ opportunity to use

the on-line materials developed for the LL.M. program to enrich their residential courses. Even for residential students, basic competencies can be reinforced by on-line learning, freeing class time to be devoted to more subtle or complex issues or practical exercises.

2. Description of Proposed Curriculum

Like the residential program, the on-line version of the LL.M. program in International Business Law will require that the student earn 24 hours of course credits. Moreover, most of the required course work will be essentially the same as that required for the residential program. However, the nature of the delivery context and format necessitates certain modifications:

a. Based on the advice of vendors specializing in on-line course delivery, we contemplate courses arranged in eight-week terms, not unlike the traditional quarter system. Initially, the school will admit students to begin the program only in a specific term in the fall of the year. After the program is up and running, however, it may be possible to admit students on a rolling basis; once created, the courses can be taught during any term, subject to staffing constraints.

b. There is little demand for a part-time residential LL.M., extending longer than two semesters of study. For the most part, students who come to the U.S. to study have left behind whatever employment they had. In the on-line environment, however, we anticipate applications from persons who would want or need to hold down full-time or part-time jobs, students who might be able to afford the tuition only if their employment continues. That could necessitate a slower pace, and we see no reason not to allow a somewhat extended time period to complete the degree. On the other hand, the program must be completed in a period of time short enough to allow for cumulative learning that does not become stale. Ordinarily, that would mean taking at least two courses per term. Thus, we contemplate allowing the student the flexibility of completing the on-line program in a period of time no shorter than three terms and no longer than five terms.

c. In the 2003-2004 academic year, the law school introduced an LL.M.-J.D. transfer program, allowing our residential LL.M. graduates who have done particularly well to transfer into the J.D. program with about half a year of credit toward completion of the J.D. degree. There are currently several such LL.M. graduates studying for the J.D. degree. At this point, the school does not have sufficient confidence in our ability to make the necessary judgments based on students whose performance is entirely on-line. Until we do have such confidence, we do not propose to offer transfer on such special terms to the graduates of the on-line program. Of course, such graduates will be welcome to apply for admission into our J.D. program, but they will not be permitted to transfer any credit toward that degree, nor will they be allowed to transfer from the on-line LL.M. program into the residential LL.M. program. This policy will be re-evaluated when adequate experience has been gained with the on-line program.

The requirements of the two versions of the degree are compared below.

Current Requirements for **Residential** LL.M in International Business Law:

Program Structure: courses taken over two 13-week semesters in residence

Required Courses: Foreign Graduate Seminar (4 credits, over two semesters)
U.S. Legal Writing (3 credits, over two semesters)
U.S. Contract Law for the LL.M. (3 credits)
Business Associations for the LL.M. (3) or Business Associations (4)

Proposed Requirements for **On-line** LL.M. in International Business Law:

Program Structure: courses taken over no less than three, and no more than five, 8-week terms

Required Courses: Introduction to U.S. Law (3 credits)
U.S. Legal Writing I: Basic Writing Skills (2 credits)
U.S. Legal Writing II: Transactional Writing (2 credits)
U.S. Contract Law for the LL.M. (3 credits)
Business Associations for the LL.M. (3)

Electives for both programs: Additional electives are taken to fill out the required 24 credits. They are chosen from offerings within the following list, subject to the requirement that at least one of the electives must be one of those courses that are underlined:

Alternative Dispute Resolution (2)
Antitrust Law (3)
Bankruptcy (3)
Conflict of Laws (2 or 3)
Contemporary Issues in International & Comparative Law (1)
Corporate Finance (3)
Corporate Real Estate Transactions (2)
Credit Transactions in the Global Economy (1)
Cyber Law (2)
Debtor-Creditor Law (3)
Doing Business in the U.S. (3)
Employment Law (3)
Federal Income Tax (3)
Federal Income Tax of Corporations & Shareholders (3)
Financial Institutions Regulation (3)
Global Corporate Governance Law (3)
Insurance Law (3)
Intellectual Property Survey (2)
Intellectual Property: Business & Strategic Planning Perspectives (1)
International Banking and Finance Law
International Business Transactions (3)
International Environmental Law
International Issues in Intellectual Property Seminar (3)

International Law (2)
International Real Estate Transactions (2)
International Tax (3)
International Trade & Development
Mergers and Acquisitions (3)
Remedies (2)
Remedies in Transnational Litigation (1)
Sales (3)
Secured Transactions (2)
Securities Regulation (3)
The World Trade Organization and Dispute Settlement (2)

Of course, the list of available electives changes over time according to availability of instructors and to faculty's perceptions of subject-matter importance. Moreover, some of these courses are not offered every semester even for the residential students, and some may not be put into on-line format. For the first year of the offering of the on-line degree program, we plan to have enough electives placed in on-line format that students will have some meaningful choice, but more extensive on-line elective offerings will be developed over time. In developing the on-line version of each course, there may be some adjustment in credit hours attributed to the course.

The Foreign Graduate Seminar for residential students, together with their one-month on-campus "orientation" program, is being replaced with a course called "Introduction to U.S. Law." This course will probably be "front-loaded" during the first term; that is, it would be the only course the student takes for the first three weeks. It will be designed to give students a basic familiarity with the concepts essential to reading about American law, including: the federal structure of the nation and the associated structure of our court system; the basic differences between civil and criminal procedure; an introduction to administrative and regulatory processes; and the allocation of doctrine among the basic subjects of tort, contracts, property, and criminal law.

As with the residential LL.M. program, on-line students' course schedules will be determined with the advice of the Director of the program, taking into account the student's prior course work and experience, the career goals of the student, and the sequencing of courses. In particular, for students who have not already had a good grounding in basic International Law, our first course in International Law will be strongly recommended. Except in unusual circumstances, full-time students would be required to enroll in no fewer than 6 credits and no more than 12 credits per term; part-time students would be required to enroll in no fewer than 3 credits and no more than 6 credits per term. (Attached as Appendix A is a document illustrating the probable course sequence for students who complete their degree in three terms as well as a sample course sequence for students who extend their program to the maximum five terms.)

The use of traditional textbooks is complicated by the possible necessity of mailing (unreliably) books to distant parts of the world. Solutions being explored include the use of e-books, which some law - publishers now produce, as well as the compilation of materials in the public domain in digital form into readers. In addition, students will have access to the enormous on-line resources of our library and its affiliates, which includes statutory and case law as well as articles written about the law. With regard to books that do not exist in digital form, but that might be of assistance to students (for example, monographs), generally students will have to acquire these themselves or rely upon their access to local libraries. As graduates of law schools in their respective countries, they should have some degree of access to useful materials.

The same grading system will be used for the on-line courses as for the residential LL.M. courses. That system is currently being revised. The current grading system is three-tiered: Honors, Satisfactory, and Unsatisfactory. It is anticipated that the new system will be a four-tiered system (e.g., Honors, High Pass, Low Pass, Fail).

There will be several forms of monitoring and advising during the student's period of study. Deltak will monitor the rate of completion of course segments, so that the law school can identify a student who is not proceeding at an appropriate pace and intervention can be initiated in order to discern the nature of the problem. Synchronous communication by sections leaders (adjunct faculty) will be combined with asynchronous communication (by e-mail) with both section leaders and primary course instructors in order to provide critical learning assistance and advice and to identify students who may be having particular problems that can be addressed.

3. Administrative Arrangements

The On-line LL.M program will be under the direction of a faculty member appointed as Director of the program. Initially, this function will be served by Dale Nance, the John Homer Kapp Professor of Law. Professor Nance has over 30 years of experience teaching law and has been a member of the CWRU faculty since 2002. His principal field of research has been the law of evidence, in which he has long maintained a comparativist (international) approach. (For example, his basic course in trial evidence, rather than being a "how to" course on presenting and opposing evidence in American trial courts, has been structured as a course on the differences between Anglo-American courts and Continental European courts and how those differences explain the differences in the rules of evidence employed.) Professor Nance also teaches a course on the Law of Archeological Relics, which has a heavy international component because of the international trade in legal and illegal artifacts and international

treaties enacted to address such matters.

The Director has been and will be consulting regularly with those who administer our residential LL.M. programs in order to assure that our residential and on-line programs are roughly equivalent, as least as much so as is possible given the difference in delivery systems. The Director also will be working with an on-line learning specialty company, an independent contractor selected to provide expertise in on-line education. This company will be a full-service provider: it will provide pre-program market research, on-line program design and development, faculty support and training, program marketing, admissions recruitment and management, and technology support. All fundamentally academic decisions, including admissions decisions, student curriculum planning, course grading and awarding of credit, and final degree certification will, of course, be retained by the law school.

After considerable research and numerous interviews, the law school's administration has settled on, and is currently engaged in final negotiations with, the company Deltak. (See [www.deltak-innovation.com/.](http://www.deltak-innovation.com/)) Deltak specializes in partnering with educational institutions to create on-line learning programs. Over the last 15 years, it has launched over 100 on-line degree and certificate programs. Its partners include Boston University and Purdue University. The collaboration with Boston University is particularly relevant to us because it has produced an on-line LL.M. (in Taxation). This provides confidence that Deltak has appropriate experience in the law-course environment and with a highly regarded law school. Deltak has recently been acquired by the prestigious John Wiley & Sons and will be one of three businesses within the Wiley Global Education group.

4. Need for New Delivery System for this Extant Degree Program

There are many foreign attorneys who wish to earn an LL.M. in the area of international business. Based on input from current residential LL.M. students, we understand that there is a high demand in foreign countries for training and degrees in U.S. business law concepts and practices. There are currently 30 residential LL.M. students enrolled in the LL.M. in International Business Law. Some foreign attorneys have been able to obtain tuition assistance from their current corporate, governmental and law-firm employers for the LL.M. in International Business Law because it has direct application to the performance of their jobs. While other United States law schools offer LL.M.s in a variety of areas, including specialty areas such as international tax, international securities and international environmental law, only a few other U.S. schools offer an LL.M. in international business, and so far

none has offered a fully on-line program, one without a significant residency requirement.¹

Both the residential and on-line programs represent the natural growth of the law school's integration of international legal concepts into many J.D. courses. The program recognizes the globalization of business and the requirement that attorneys who represent international clients become knowledgeable in more than their own legal systems. This is particularly true for those attorneys who represent clients that do business in the United States or whose clients deal with other persons that are doing business in the United States. No longer can an attorney adequately represent such clients based solely upon an understanding of local national laws. Without an understanding of international treaties and business-law concepts and approaches such as those employed in the United States, a foreign attorney may fail to provide sophisticated clients with a complete analysis of issues, risks and available solutions.

Further, foreign governments and their lawmakers often look to United States business law and institutions in reviewing and reforming their own laws and systems. Even when they do not adopt United States models, as is often the case, they frequently want to understand how their systems differ from those in the United States. Finally, the accelerating process of harmonization of international business laws requires that foreign governments understand the intersection of bilateral and multilateral business and tax related treaties with business laws enacted in the United States and other developed countries.

5. Prospective Enrollment

Both the residential and on-line programs in International Business Law are designed primarily for non-U.S. lawyers who will interact with American lawyers or represent clients whose legal affairs are affected by United States business law. Thus, applicants must have a first degree in law from a foreign university and at least one year of legal or business experience.² Candidates must have a strong academic record and a good command of English. Students whose first language is not English must submit a TOEFL minimum test score of 90 or other equivalent test score. Just as the university aspires to raise that minimum, so does the law school, since facility in the English language is vitally important

¹ ABA.net.org – Post J.D. Programs by School; llm-guide.com – LLM Guide, Master of Laws Programs Worldwide.

² Foreign business executives who do not have a law degree and would benefit by a year of immersion in international business law are considered for admission into the residential program, so applications from students with a business degree from a foreign university will be considered for the on-line program as well. Such students, however, will never constitute a significant portion of the enrollment. Also, the program will not be open to J.D. graduates of U.S. law schools.

in understanding the dense conceptualism of the law.

The existing residential LL.M. programs admit about 80% of their aggregate applicant pool, and about 40% of those admitted matriculate. Since the inception of the LL.M. programs, CWRU has graduated more than 800 students with LL.M. degrees from over 60 different countries. Of all the students who have matriculated in the LL.M. program since 1992, only a very small number (fewer than ten) have failed to complete the program of study.

We believe that web-based and student word-of-mouth marketing are the most successful approaches. When the residential LL.M. in International Business Law was created, in 2008, we expected enrollment in the first few years of the program to be no more than three to ten students per year. That program has already grown to 30 students. The school's pending agreement with Deltak contemplates a minimum of 42 students in the first year, with increases thereafter.

Based on our experience with the residential LL.M. degree, it is very likely that most students in the program will be from groups that constitute minorities in the U.S. That in itself serves the goal of diversity, but we of course hope and believe that spreading the good reputation for the school and the university internationally will contribute to successes in increasing the diversity of our residential student populations in all our colleges and schools.

6. Adequacy of Faculty and Facilities

The law school anticipates that the course development can be handled by the existing faculty. If necessary, we may contract out to obtain the services of one or more faculty at other law schools to fill particular curricular gaps, but we have no present anticipation of a specific need to do so. However, the teaching model contemplated by vendors with which we have consulted suggests that we will probably need to hire several adjunct faculty to assist in providing the synchronous "chat room" experience associated with each course.

There may be some modest additional administrative work associated with admissions and monitoring of students' completion of course work necessary for the degree. Because the program is entirely on-line, there is very little increase in physical space needs, other than what may be required to house the modest additional administrative personnel.

7. Plans for Meeting Additional Needs

The hiring of potential adjunct faculty will begin as soon as the program is approved. How many such faculty will be needed will depend on enrollment levels. Over time, with the emergence of a cadre

of motivated alumni of the program, it may be possible to incorporate some of these individuals as “on-site” discussion leaders in cities with significant enrollment.

8. Projected Additional Costs and Institutional Commitment to Meet Costs

The on-line program will have a positive financial impact on our J.D. program. The contemplated contract requires our collaborating technology company, Deltak, to bear all expenses associated with the development of the on-line program with the exception of the following: (a) expenses for faculty compensation; (b) additional technical support for faculty or students beyond that provided by the Deltak platform; (c) additional support for added student admissions processing; (d) support required for any additional student financial aid inquiries and processes; (e) additional costs of added student academic support; and (f) additional costs of ceremonial or other expenses to confer student degrees.

Deltak will: provide customized course development services in collaboration with faculty, delivering to the faculty information about best practices in effective course design and implementation as well as outcome assessment; provide all marketing related to the on-line program; generate enrollment applications, collect all pertinent admissions information to complete a student’s admission file, and forward the file to the law school for admissions decisions; provide and host the on-line Learning Management System that supports the program; and provide ongoing student technical support services including but not limited to a 24x7 helpdesk and a designated Student Support Specialist responsible for ongoing communications with students.

The contemplated contract calls for Deltak and the law school to split tuition revenues 50-50, except for the first year, during which Deltak will receive a 60% share in recognition of its up-front costs in the development of the program. The present plan is to charge the same total tuition for the on-line LL.M. degree as is charged for the residential LL.M degree. The program can be discontinued if it does not produce a positive cash flow, so there is little down-side potential and considerable up-side potential.

9. State Approval

Attached as Exhibit B is an examination of the compliance of this proposal with the Ohio Board of Regents’ Advisory Committee on Graduate Study (RACGS) Guidelines for the approval of new delivery formats for existing degree programs.

Appendix A

Illustrative Curricula

Standard Three-Term Curriculum

First Term (8 credits):

- Introduction to U.S. Law (3)
- U.S. Legal Writing I: Basic Writing Skills (2)
- U.S. Contract Law for the LL.M.(3)

Second Term (8 credits):

- U.S. Legal Writing II: Transactional Writing (2)
- Business Associations for the LL.M. (3)
- International Law for the LL.M. (3)

Third Quarter (8-12 credits):

- International Business Transactions (3)
- Electives (5-9 credits)

Illustrative Alternative Five-Term Curriculum

First Term (5 credits):

- Introduction to U.S Law (3)
- U.S. Legal Writing I: Basic Writing Skills (2)

Second Term (5 credits):

- U.S. Legal Writing II: Transactional Writing (2)
- U.S. Contract Law for the LL.M. (3)

Third Term (6 credits):

- Business Associations for the LL.M. (3)
- International Law for LL.M. (3)

Fourth Term (5 credits):

- International Business Transactions (3)
- Elective (2)

Fifth Term (3-6 credits):

- Electives

Appendix B

Ohio Board of Regents' Advisory Committee on Graduate Study (RACGS) Guidelines

RACGS Guidelines have been adopted with the intent “to permit flexibility in adapting degree requirements to alternative audiences, while not permitting institutions to design and deliver essentially new degrees within the format of a previously approved degree.” Thus, on those occasions when “a previously approved degree program will be offered at an off-campus site, or extended to a different audience via electronic or blended means,” RACGS need only be notified in writing. This requires only “a brief, concise description of the program that addresses the conditions” necessary to qualify as a new delivery of a previously approved degree. These conditions are stated and addressed below.

Condition 1. Under the RACGS Guidelines, “a program will be considered to have been ‘extended to a different audience via electronic or blended means’ when 50% or more of the course delivery is off-site or via alternative delivery models.”

Our extant LL.M. in International Business Law is an exclusively residential program; foreign students must travel to the U.S. to take the entire program on campus. For the proposed on-line LL.M. in International Business Law, 100% of the program will be delivered on-line as distance learning. The program is clearly extended to a different audience via electronic means. At some point in the future, there may be a small off-site in person component if we add discussion coordinators who work in particular foreign cities.

Condition 2. Under the RACGS guidelines, “a degree program will be ‘previously approved’ when less than 50% of the content or course requirements in a degree previously given approval has been changed.” “The Graduate Dean (or equivalent administrative officer) at each institution is responsible for the determination of whether or not the curriculum has been changed less than 50%.”

An examination of the description of the program, and its comparison with the residential version thereof, which appears on pages 4-7, above, demonstrates that the great bulk of the course requirements remain the same in the on-line program. The content of the courses will be as similar as is possible given the difference in delivery modality.

As indicated by the accompanying letter of support, Lawrence Mitchell, Dean of the Case Western University School of Law, has examined this proposal and determined that less than 50% of the curriculum for the on-line LL.M. in International Business Law has been changed as compared to the previously approved residential LL.M in International Business Law (see description provided above, pages 3-5) and that otherwise the program standards can and will be maintained in accordance with RACGS Standards (see “RACGS Program Standards” below).

“RACGS Program Standards:

“To ensure that off-site and alternative delivery models adhere to the same standards as on-campus programs, RACGS member institutions will be responsible for utilizing the following guidelines and shall use the same guidelines in those cases where new degree programs using alternative delivery models are being brought forward for approval (these may supercede new degree program criteria as outlined earlier in these guidelines).

1. The program is consistent with the institution's role and mission.
2. The institution's accreditation standards are not appreciably affected by offering the program, especially via alternative delivery mechanisms.
3. The institution's budget priorities are sufficient to sustain the program in order for a selected cohort to complete the program in a reasonable amount of time.
4. The institution has in place sufficient technical infrastructure and staff to support offering the program, especially via alternative delivery mechanisms.
5. The institution has in place sufficient protocols for ensuring instructional commitments are met, including instructor/staff training, compliance with copyright law, and quality instruction among other variables.
6. The institution has in place a relevant and tested method of assessing learning outcomes, especially in the case of alternative delivery mechanisms.
7. As new delivery mechanisms are brought into course instruction, students and faculty are presented with sufficient training and support to make appropriate use of new approaches.
8. The institution assures that the off-site/alternatively delivered program meets the same quality standards for coherence, completeness and academic integrity as for its on-campus programs.
9. The faculty offering the program maintains the same standards and qualifications as for on-campus programs.
10. The institution assures that, for all off-site and alternative programs, students will have access to necessary services for registration, appeals, and other functions associated with on-campus programs.
11. In those instances where program elements are supplied by consortia partners or outsourced to other organizations, the university accepts responsibility for the overall content and academic integrity of the program.
12. In those instances where asynchronous interaction between instructor and student is a necessary part of the course, the design of the course, and the technical support available to both instructor and student are sufficient to enable timely and efficient communication.

13. Faculty are assured that appropriate workload, compensation, and ownership of resource materials have been determined in advance of offering the off-site or alternatively delivered course.
14. Program development resources are sufficient to create, execute, and assess the quality of the program being offered, irrespective of site and delivery mechanism employed.
15. Procedures are in place to accept qualified students for entry in the program-it is imperative that students accepted be qualified for entry into the on-campus program. In addition, program costs, timeline for completion of the cohort program and other associated information is made clear to prospective students in advance of the program's initiation.
16. Assessment mechanisms appropriate to the delivery approach are in place to competently compare learning outcomes to learning objectives.
17. Overall program effectiveness is clearly assessed, via attention to measures of student satisfaction, retention rates, faculty satisfaction, etc.”