nvao
nederlands – vlaamse accreditatieorganisatie

MOOCs and online HE
A survey

June 2014

Summary

It is with interest that the Accreditation Organisation of the Netherlands and Flanders (NVAO) is looking at the potential of Massive Open Online Courses (MOOCs), blended learning, and online education in general, to strengthen the quality of programmes in higher education. The NVAO approaches this issue from three distinct perspectives: Dutch/Flemish, European, and global.

In 2009, further to discussions held under the auspices of the European Association for Quality Assurance in Higher Education (ENQA), the NVAO adopted a position on online higher education that can be summarised in three points: (1) while they do not explicitly refer to online education, the assessment frameworks set out by the NVAO are well able to accommodate input relating to online education, given their open character; (2) the NVAO considers it crucial that expertise on online education is represented on assessment panels, and will ensure this is the case; (3) the NVAO considers it a duty to have expertise on online education in house, to keep this expertise up to date, and to share it.

Today, in 2014, these three points still describe our basic position, from which we are now seeking to integrate various recent developments. The NVAO is aware that some universities of applied sciences and research universities[1] have questions that need to be answered, while other institutions prefer the NVAO not to intervene and to leave them free to make their own decisions, or at least not to impose restrictions. Rather than seeking to prescribe, therefore, the text of this memorandum, especially where internal quality assurance is concerned, provides a mix of descriptions and recommendations.

This memorandum explores scenarios in which a research university or university of applied sciences in the Netherlands or Flanders:
- is seeking the best way to handle the acknowledgement of online courses (MOOCs or otherwise) that students have taken elsewhere;
- sets quality requirements for online courses provided by another institution that are to be included as part or all of a unit of study in one of their own bachelor's or master's programmes;
- sets quality requirements for online and blended learning programmes that they have developed themselves.

The NVAO deems it unlikely that MOOCs will be subject to accreditation in the Netherlands or Flanders in the foreseeable future. However, we do believe that the parties concerned may in time develop a shared view on what constitutes a 'good' MOOC. The NVAO would welcome the opportunity to take part in documenting and disseminating such good practices.

In its role as an accreditation organisation, the NVAO aims to contribute its views to the policy development process and to be of assistance in the removal of barriers to the promotion of online education.

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[1] Both the Netherlands and Flanders distinguish between two types of higher education: programmes oriented towards professional practice are taught at *hogescholen*, for which the standard English translation is 'universities of applied sciences' in the Netherlands and 'university colleges' in Flanders, while programmes that are more theoretical in orientation are taught at *universiteiten*, for which the standard English translation is 'research universities' in the Netherlands and 'universities' in Flanders. The English translation of this memorandum conforms to the standard used in the Netherlands except where specific reference is made to the Flemish context.

Internationally, the NVAO further intends to examine the relevant European legislation and regulations in collaboration with its European sister organisations and to initiate any necessary actions on the basis of these findings. A further point for a European agenda might be to call attention to the need for MOOC certificates that meet the highest standards and to how providers may contribute to achieving these.

Contents

1 Introduction

This memorandum briefly sketches the background to its creation, articulates the position the NVAO has previously taken on online and blended learning, describes two MOOC-specific issues of relevance to quality assurance, and explores these on the basis of five scenarios. Subsequently, it considers elements of the NVAO's Dutch/Flemish, European and global perspectives. Following a reflection on the 'open' concept, the memorandum looks at traditional providers of distance learning and their relationship with 'regular' universities of applied sciences and research universities. This is followed by a section touching on particular characteristics, preferences and views of students. Having taken a cautious glimpse into the future, the memorandum concludes by bringing together a number of elements that can guide the NVAO in formulating a more precise position on online and blended learning in higher education, including MOOCs.

2 Background

The drafting of this document has been motivated by the emergence of MOOCs (Massive Open Online Courses). MOOCs are currently generating great interest among students, teachers, other parties in and around higher education, the media and to a certain extent the wider public. Discussion of MOOCs brings out robust views: some are for, some against, others maintain 'there's nothing new under the sun'. However, there does seem to be a growing consensus about their positive effect in terms of an increased interest in online higher education, and even in higher education in general ('MOOCs have thrown open the gates to higher education').

Higher education institutions that set up MOOCs do this primarily to avoid 'missing the boat' (brand familiarity, marketing, identifying talented students, opportunities for experimentation, evaluation using large numbers of subjects, employment for learning analytics[2]), while at the same time continuing to emphasise the importance and quality of their non-MOOC online and blended learning programmes. In this context, the NVAO feels it is important to establish its position with regard to online and blended learning in higher education, which in its view must be seen in the light of wider developments.

3 Position of the NVAO up to the present

The NVAO has previously established a position on online and blended[3] learning, albeit on an informal basis, which it has promulgated as the occasion arose. This position takes in three elements: (1) while they do not explicitly refer to online education, the assessment frameworks set out by the NVAO are well able to accommodate input relating to online education, given their open character; (2) the NVAO considers it crucial that expertise on online education is represented on assessment panels, and will ensure this is the case; (3) the NVAO considers it a duty to have expertise on online education in house, to keep this expertise up to date and to share it. The clearest example of this last point is the NVAO's contribution to the development (2005-2012) of the European E-xellence instrument, which is used to measure the quality of online and blended learning programmes and in principle

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[2] Learning analytics: An emerging approach that uses techniques of web analytics and social network analysis to collect data on students' use of a virtual learning environment to visualise and analyse learning interactions.

[3] Blended learning: A mix of e-learning with traditional teaching and learning practices. Typically there is a combination of face-to-face interaction with online learning.

is compatible with all national external quality assurance systems[4]. In a number of cases the NVAO has brought E-xcellence to the attention of education institutions for use as an aid in structuring internal quality assurance for online and blended learning and the resulting input for external assessment geared towards accreditation.

The NVAO's position as described above remains relevant and tenable. This memorandum now goes on to consider the extent to which this position requires refinement and supplementation. Though initially motivated by MOOCs, the scope of this survey also extends beyond them. In principle, online and blended learning should be subject to internal and external quality assurance.

4 Two MOOC-specific issues

The scope of this memorandum extends beyond MOOCs; however, there are certain quality assurance-related aspects that are specific to MOOCs in particular. We will consider two of them here: first, the relationship between MOOCs and blended learning and, second, that between MOOCs and credits.

MOOCs and blended learning
Recent years have witnessed an increase in blended forms of learning and the emergence of MOOCs. In terms of quality assurance, there is a potential tension between these two developments, arising from the 100% nature of MOOCs. That is, an MOOC itself can never be blended and is an inflexible component in a curriculum – a component that cannot easily be made to fit the mixed online and contact structure that programmes normally, and with good reason, adopt: 'Learning outcomes determine the means used to deliver course content. In a blended-learning context there is an explicit rationale for the use of each component in the blend' (E-xcellence Benchmarking Statement no. 11).

MOOCs and credits
Completing a Massive Open Online Course may provide recognition in various forms:
- formal recognition by universities of applied sciences and research universities;
- formal recognition by other parties, for example the professional field;
- informal recognition, for example the evaluation of an online showcase portfolio by peers.

This memorandum is concerned only with formal recognition by universities of applied sciences and research universities for the purpose of assuring the value of qualifications awarded by their accredited programmes. This recognition is awarded in the shape of credits. The conditions governing when and how such recognition should be granted is a topic of much discussion.

This discussion centres on the concept of a 'certificate' and revolves around three questions:
(a) What does the certificate state, what is its status?
(b) How do you know that the person whose name is on the certificate is the person who sat the relevant exams?
(c) How do you know that the holder of the certificate did not receive assistance on the exams?

Regarding the first question (a): we can identify a range of variants. At one end of the spectrum are certificates that are no more than proof of participation. At the other end is a

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[4] The full name of the instrument is *E-xcellence: Quality Assessment for E-learning: a Benchmarking Approach*. It consists of 35 Benchmarking Statements with indicators and a handbook.

certificate that formally and clearly states on whose authority it was issued, provides information on the content, level and study load, states that the holder has achieved the desired learning objectives, provides information on the testing methods employed and lists the credits obtained, according to a standard international system or in some other acceptable format. An important point with regard to many MOOCs is that the educational level is simply too low to count towards any bachelor's or master's curriculum. A further issue is the *number* of credits: many MOOCs are so restricted in scope that the number of ECTS credits is less than 5.

Regarding the second question (b): there are two variants, the first being an 'unauthenticated certificate', where no verification of the identity of the holder has taken place. The second variant is the authenticated certificate, where the holder's identity has been verified. There are several ways to do this, physically or online. An example of online authentication is Coursera's Signature Track, where candidates display their ID via a webcam and their identity is verified on the basis of biometric data and/or facial recognition.

Regarding the third aspect (c): here again there are two variants. The first is a certificate issued on the basis of unsupervised examinations. The second is a certificate issued on the basis of supervised examinations. These, too, can take various forms, physical or online.

➢ Physical: A non-MOOC example is the Open Universiteit Nederland's examination locations in the Netherlands and Flanders. An MOOC example is the Pearson test centres, which support the EdX MOOC platform (Pearson is among the largest commercial providers of test centres worldwide).
➢ Online: one frequently used term is *online proctoring*, which is used to check for irregularities either live using a webcam or retrospectively on the basis of a full recording. Prior to the start of the exam the student rotates the webcam to provide a 360° scan of the room.

Following this discussion of MOOCs and credits, the NVAO wishes to emphasise that our programme accreditation activities always look at the final level achieved. Knowledge acquired through an MOOC can contribute to this, but apart from credits obtained on the basis of MOOCs, it is the final level as such that will always be the focus of the programme's assessment of the student, as well as of subsequent external accreditation assessments.

5   Online education and quality assurance: five scenarios

We will now go on to explore internal and external aspects of quality assurance within online and blended learning on the basis of five scenarios. Scenarios 1-4 are of direct significance for the NVAO, whereas scenario 5 is of more indirect significance.

The NVAO is aware that some higher education institutions have questions that need to be answered, while other institutions prefer the NVAO not to intervene and to leave them free to make their own decisions, or at least not to impose restrictions. Rather than seeking to prescribe, therefore, the text of this memorandum offers a mix of descriptions and recommendations, emphasising internal quality assurance in particular.

Scenario 1.
A student enrolled in a bachelor's or master's programme at a research university or university of applied sciences in the Netherlands or Flanders submits an 'exemption' or

'external course' request in connection with an online course provided by another institution. The request might also relate to recognition of acquired qualifications or competencies.

Internal quality assurance
The request is judged on the basis of all the criteria customarily applied to comparable requests relating to non-online courses. In addition, since it concerns an online course, the request should also be judged on the acceptability of the online nature of the education in relation to the programme as a whole (the blend). Where the course is an MOOC, the decision to grant or reject the request will depend in part on the type of certificate[5].

External quality assurance
Depends in part on the frequency of this scenario, which should be considered in the programme assessment. In that case, expertise on panel. Focus on testing and exit qualifications.

Scenario 2.
A university of applied sciences or research university in the Netherlands or Flanders incorporates online teaching material offered by another institution as part or all of a unit of study in one of its own bachelor's or master's programmes.

Internal quality assurance
Justification for the introduction of this material on the basis of all the criteria customarily applied (or which would be applied) to a comparable non-online situation in which students complete a contact course elsewhere that counts as a unit of study in their own bachelor's or master's programme. In addition, since the request relates to an online course: justification of the acceptability of the online nature of the education in relation to the programme as a whole (the blend). Where the course is an MOOC, requirements should be laid down for the type of certificate or the institution can carry out tests of its own. Where an institution prescribes or recommends an MOOC in the context of blended learning, whether or not in combination with other curricular components of its own, and then administers its own tests on the relevant material, students indirectly receive credits for the MOOC.

External quality assurance
Always to be considered during programme assessment. Expertise on panel. Focus on testing and exit qualifications.

Scenario 3.
A research university or university of applied sciences in the Netherlands or Flanders develops an online unit of study for inclusion in one or more of its own bachelor's or master's programmes.

Internal quality assurance
Justification on the basis of all the criteria customarily applied to the development and introduction of a new unit of study. In addition, since the request relates to an online course: justification of the acceptability of the online nature of the education in relation to the programme as a whole (the blend). Ideally, there should be a solid system for the development of online and blended learning that is thoroughly embedded in the internal quality assurance framework.

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[5]A certificate without credits from an institution offering an MOOC is sometimes awarded credits by a different institution. In that case, there are three institutions involved: the course provider, the credit provider and the institution where the student is enrolled.

External quality assurance
Always to be considered during programme assessment. Expertise on panel.

Scenario 4.
A university of applied sciences or research university in the Netherlands or Flanders develops and offers a complete bachelor's or master's programme online.

Internal quality assurance
As for scenario 3, with the addition of a justification for the absence of contact elements.

External quality assurance
Naturally, extensive consideration during programme assessment. Expertise on panel.

Scenario 5.
A university of applied sciences or research university in the Netherlands or Flanders develops an online unit of study that it offers to external parties. These may be students enrolling in individual courses (whether or not registered elsewhere) or other higher education institutions. The university of applied sciences or research university then assumes the position of an institutional provider as in scenarios 1 and 2.

Internal quality assurance
It would be to the institution's credit if when designing, developing and offering such a course it account for the interests of participants in having a certificate that (in the terms used under 'MOOCs and credits' on page 2): (a) formally and clearly states on whose authority it was issued, provides information on the content, level and study load, states that the holder has achieved the desired learning objectives, provides information on the testing methods employed and lists the credits obtained, according to a standard international system or in some other acceptable format; (b) is demonstrably based on authentication; (c) states that the examinations have been administered under supervision and specifies the nature of this supervision.

External quality assurance
Not applicable.

6 Dutch/Flemish, European and global perspectives

The NVAO was established by the Dutch and Flemish governments as an independent accreditation organisation tasked with providing an expert, objective assessment of the quality of higher education in the two countries. The NVAO operates internationally and has an international mindset. This international orientation is to a significant degree European. The accreditation system is one of the accomplishments of the Bologna Process, in which the NVAO seeks to play an active role and strengthen collaboration in Europe. The NVAO also follows developments outside Europe. In the following section, we will consider online higher education from the NVAO's Dutch/Flemish, European and global perspectives, respectively.

6.1 The Netherlands and Flanders

Providers
All research universities and universities of applied sciences in the Netherlands and Flanders provide online education to some extent. Several research universities offer MOOCs and/or have MOOCs in preparation, including at least eight of the fourteen research

universities in the Netherlands and at least one of the seven research universities in Flanders. To the best of our knowledge, no universities of applied sciences are doing so at this time.

Quality assurance: E-xcellence
The Netherlands and Flanders have made substantial contributions to the development of E-xcellence, not only through the NVAO but also via the Flemish Interuniversity Council (VLIR) and Council of Flemish University Colleges (VLHORA). The Open Universiteit Nederland (OUNL) was one of the major players in the project.

No complete picture of the extent to which higher education institutions are using E-xcellence currently exists. The LOI university of applied sciences has incorporated E-xcellence into its internal quality assurance system at institutional level, as is mentioned several times in the LOI Institutional Audit Committee report. The Faculty of Psychology at the OUNL has conducted a pilot using E-xcellence, and Delft University of Technology and HU University of Applied Sciences Utrecht have both shown serious interest. Artevelde University College Ghent is working with a combination of E-xcellence and a system developed by the company PROSE.

6.2 The Netherlands: legislation, policy

Dutch legislation includes at least three provisions with implications for what is possible and permissible in the area of online higher education.

The Policy Rules for Effective Higher Education 2012 (*Beleidsregel doelmatigheid hoger onderwijs*) set out a 'location rule' stipulating that (as formulated in the explanation to to Article 3 paragraph 1(c) through (e)): 'in principle, one-third of a programme, including work placements and final projects, may be completed at a location outside the institutional premises without need for the Minister's permission. This also includes curricular components developed (wholly or in part) by other institutions. The stated percentage applies to professional and academic bachelor's degree programmes and to associate degree programmes, and corresponds to 80, 60 and 40 credits respectively. This allows institutions ample freedom to design their programmes, within the confines of the overall study load, without any foreseeable adverse effects on macro-level effectiveness. A minimum threshold of 30 credits applies to one-year professional and academic master's programmes as the one-third stipulation would otherwise require them to apply for a macro-level effectiveness test where as few as 20 credits were obtained outside the institutional premises. Given the scope of final projects and work placements, this would be undesirable.' Considering that it is effectiveness at the macro level that is at issue here, this provision relates only to government-funded higher education. The Dutch Ministry of Education, Culture and Science has announced plans to review this policy rule in the light of potential impediments.

The Memorandum on Dutch Higher Education Abroad dated 7 June 2012 (*notitie Nederlands hoger onderwijs in het buitenland*) distinguishes three forms of education abroad: A. Organised by Dutch institutions; B. Double degrees; C. Distance learning. The section of the memorandum dealing with item A includes the following passage: 'In the interests of prudence and credibility it is important that a representative share of the curriculum is always provided by the Dutch programme in the Netherlands (at least one quarter of the programme).' This stipulation is often referred to as the '25% rule'. The section dealing with item C states: 'Distance learning, whether or not employing e-learning, is by definition not tied to any particular location, and can therefore also take place abroad.' The text under C makes no mention of the 25% rule. The obvious conclusion is that the 25%

rule does not apply to distance learning. The view of the Ministry of Education, Culture and Science however is that the 25% rule does in fact apply to distance learning. The NVAO fairly regularly receives queries from institutions in the Netherlands that are considering offering distance education to students abroad. The NVAO is often the first official body they approach in this context, and it is through the NVAO that the Ministry's position is communicated.

The February 2011 version of the Protocol on Dutch Accreditation Applications for Joint Degrees, dated 7 June 2010 (*Protocol voor Nederlandse aanvragen Accreditatie leidend tot een Joint Degree*) (and the similarly-worded TNO equivalent of this Protocol) reads: 'Section 7.3(c) of the Higher Education and Research Act came into force on 1 July 2010. This Section contains provisions for what are commonly referred to as "joint degrees". A joint programme is a programme that a Dutch institution provides together with one or more Dutch or foreign higher education institutions, for which the collaborating institutions are jointly responsible and in which each of the Dutch partner institutions delivers a substantial element. This entails that the programme must take place in at least two locations.' A footnote adds: 'In a letter dated 16 December 2010, the director of Higher Education and Study Finance provided further specification of this condition in relation to domestic joint degree programmes. Each participating Dutch institution must deliver a substantial element of the curriculum, but in the case of a domestic joint degree programmes, this can take place within a single municipality and at a single location. However, the teaching staff from the various institutions must each deliver a substantial element.'

All three of the stipulations discussed above may act to impede the provision of higher education programmes with a high level of online content. For example, refer to scenario 4.

In a policy document on open and online higher education sent by the Dutch Minister of Education, Culture and Science to the House of Representatives on 8 January 2014, she wrote: 'I expect that components of a programme will always be administered and taken at the premises where the institution is established.' This policy document therefore does not depart from the aforementioned location rule. However, there have been indications from officials that the way is being left open to change this position in future.

In its role as an accreditation organisation the NVAO will contribute its views to the policy development process and play its part in removing any barriers to the promotion of online education.

6.3 Flanders: legislation, policy

In Flemish legislation, online education is treated de facto as regular education. Incentive funding provides an impetus for 'study paths for working students', which are for the most part online.

While there are in fact no limitations for registered institutions, there are for university colleges and universities, which are subject to a limitation of 2% of their mass eligible for a grant. This limitation is incorporated under Section II (Financing conditions) Article 7 paragraph 1 of the Decree on the Financing of the Operation of University Colleges and Universities in Flanders (*Decreet betreffende de financiering van de werking van de hogescholen en de universiteiten in Vlaanderen*), which includes criteria on enrolment, nationality and the learning account. With regard to nationality, the decree provides that students only count towards the calculation of the government funding that a university college or university receives if they satisfy a set of nine criteria. One of these relates to students who are resident outside the EU. These students only qualify insofar as the total

share of the credits they generate under a degree contract does not exceed 2% of the credit total used in the calculation of the university college or university's 'teaching base' pursuant to Article 11, and the number of 'subsidy points' generated by those foreign students under degree contracts does not exceed 2% of the university college or university's total subsidy points as calculated pursuant to Article 14 paragraph 2. A case in point would be an online student in India.

Individual agreements are in place for officially registered institutions such as the Institute of Tropical Medicine.

The Flemish minister for Education, Youth, Equal Opportunities and Brussels Affairs is expected to issue a policy document on online education in the course of 2014. The NVAO will be bringing its views on the promotion of online education and the related quality assurance to the minister's attention.

6.4 Europe

As already observed above, it is natural for the NVAO to also take a European perspective. The European dimension is relevant to our position and activities in relation to online higher education. In this section we take a look back (2009-2013) and a look forward (2014-2016), provide an impression of the MOOCs on offer around Europe and draw attention to the European Credit Transfer System (ECTS) in connection with MOOCs.

A look back: 2009-2013
The NVAO's position as briefly outlined on page 5 was first formulated on the occasion of a workshop on this topic organised by the European Association for Quality Assurance in Higher Education (ENQA) together with the Swedish National Agency for Higher Education (NAHE) in 2009. The NVAO gave a presentation and contributed a chapter to the workshop publication (2010).

In 2011 and 2012 the NVAO provided contributions to European conferences on the topic of QA in e-learning.

The ECA-NVAO Winter Seminar on MOOCs and External Quality Assurance took place at the NVAO's headquarters in The Hague on 11 December 2013 (the ECA is the European Consortium for Accreditation), with speakers including former president and CEO of Commonwealth of Learning Sir John Daniel, Commonwealth of Learning consultant Stamenka Uvalic-Trumbic, Timo Kos and Nellie van de Griend, director and manager, respectively, of Education and Student Affairs at Delft University of Technology, and Stephen Jackson, director of Reviews at the Quality Assurance Agency (QAA, UK).

These activities have contributed to the NVAO's current leading position among European accreditation organisations in the area of quality assurance for online and blended learning.

A look ahead: 2014-2016
The pursuit of a European framework for online learning fits in well with the NVAO's strategy. The NVAO Strategy 2013-2016 memorandum published in December 2013 refers to the ECA, ENQA, EUA (European University Association), EURASHE (European Association of Institutions in Higher Education), ESU (European Students Union) and EQAR (European Quality Assurance Register for Higher Education) and states (page 15): 'These networks and contacts with national government agencies, the European Commission, the Bologna working groups and the European stakeholder organisations are being used to promulgate the NVAO's vision on, for example, the assessment of exit qualifications,

testing, the training of experts and so on.' Quality assurance for online and blended learning can be added to this list.

ENQA: the SEQUENT project. ENQA has recently committed itself to new activities as a partner in the Erasmus Lifelong Learning SEQUENT project, short for 'Supporting Quality in e-learning European NeTworks'. In its Newsletter 5 (October 2013) ENQA states: 'ENQA will contribute to the SEQUENT project by attending the project events, providing input for the preparation of a training seminar and contributing through promotion and dissemination activities. The project is carried out by EADTU and EFQUEL[6].' It makes sense for the NVAO to contribute to such a project.

The European Commission. On 25 September 2013, the European Commission launched the Opening up Education initiative with the slogan: 'Innovative teaching and learning for all through new Technologies and Open Educational Resources.' The Commission stated: 'The main goal of this initiative is to stimulate ways of learning and teaching through ICT and digital content, mainly through the development and availability of OER', and 'This initiative addresses several educational difficulties at the European level. Europe is falling behind in the digital sphere; the great majority of schools are not digitally equipped and their students are not taught by digitally confident teachers, rather teachers who mainly use ICT to prepare their teaching but not as a skill for students to develop in the classroom. In the background remains the threat of facing a new digital divide between those who have access to innovative, tech-based education and the digitally excluded.' Opening up Education relates to education in the broadest sense and at all levels.

EADTU. On 25 April, five months prior to the launch of Opening up Education, the EADTU kicked off a European initiative on the theme of MOOCs with the consciously chosen related title OpenupEd. An online press event was conducted from EADTU headquarters in Heerlen and from Brussels, with European Commissioner Androulla Vassiliou (Education, Culture, Multilingualism and Youth) making a contribution entitled 'First European MOOCs – a milestone for education', in which she stated: 'This is an exciting development and I hope it will open up education to tens of thousands of students and trigger our schools and universities to adopt more innovative and flexible teaching methods. (...) We see this as a key part of the Opening up Education strategy which the Commission will launch this summer.*'*

By the start of 2014, OpenupEd had developed into a portal providing access to 176 MOOCs offered by EADTU members and several other higher education institutions. OpenupEd emphasises its 'Quality Focus': 'There should be a consistent focus on quality in the production and presentation of an MOOC. We therefore require that OpenupEd partners are Higher Education Institutions that meet national requirements for quality assurance and accreditation and have an internal QA system in place to approve MOOCs. We propose that the production and presentation of an MOOC should be linked to the QA system of an institution and to the institutional policy in open(ing up) education.' On 25 January 2014, OpenupEd published an MOOC version of E-xcellence, titled *OpenupEd label, Quality Benchmarks for MOOCs* (authored by Jon Rosewell of the UK's Open University). The NVAO provided comments on a draft version.

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[6] EFQUEL = European Foundation for Quality in e-Learning.

European Credit Transfer System
A number of publications assert that European MOOCs are fortunate in having the European Credit Transfer System (ECTS): 'Elsewhere, the recognition of credits is complicated by a lack of standardisation across borders. In that light, the ECTS has proved to be of great value for Europe' (Robert Schuwer's blog, 6 November 2013).

MOOCs offered in Europe
Figures on the number of MOOCs offered by European higher education institutions are always rapidly outdated. Different sources give widely divergent totals. One source regarded as reasonably reliable is the European Commission's European MOOCs Scoreboard, which gives a figure of 394 European MOOCs (as at 10 January 2014). Spain tops the list with 136 MOOCs. The Netherlands has 13 and Belgium 4.

6.5 Global

While the NVAO's aim is to play an active role in relation to online higher education at the European level, the organisation's approach on a global scale is more about keeping up with developments and maintaining an overview. The NVAO is well aware, for example, of the dominance of North America in the world of MOOCs. The best-known MOOC platforms – Coursera, Udacity, EdX – are American and the majority of MOOCs worldwide are offered by universities in North America. One platform that presents figures on MOOCs for each continent is StudyPortals.

The figures in the table below relate to courses offered by higher education institutions with their main location on the continent in question. The data are from 23 October 2013.

continent	MOOCs	
	n	*%*
North America	482	66
South America	0	0
Europe	196	27
Africa	0	0
Asia	33	5
Australia	22	3
TOTAL	733	100

North America accounts for nearly two-thirds of MOOCs, with Europe providing around a quarter. The remaining four continents barely contribute.

A global perspective also provides insight into the geographical distribution of online students. For example, a student in India could be studying online at a university in Flanders, while a student in the Netherlands might take part in an American MOOC.

7 The 'open' concept

Many publications and other contributions relate to 'online' and 'open' in combination. This memorandum is concerned almost exclusively with online and hardly at all with open higher education. The term 'open' only enters the picture in the European context of Opening up Education and OpenupEd, with mention also being made of Open Educational Resources. 'Open' is an integral feature in this document, however, as it is represented by the first O in MOOC.

There are various definitions of 'open' as a characteristic of education. Some have been around for four decades, others are of more recent date[7]:

- open access (no entry requirements);
- open in terms of pace (no restrictions on course duration);
- open in terms of location (no obligation to be physically present anywhere);
- open in terms of time (no fixed start date, no cohorts);
- open in terms of curriculum (students may complete the entire curriculum or individual modules);
- open availability (no charge);
- open to modification (freedom to re-use, mix, revise or distribute teaching materials, under certain conditions).

The first five of these are 'classical' forms of openness characteristic of education at open universities (for example in the Netherlands and the UK) and private education providers. The last two forms of openness listed originated with the 'Open Education' movement.

The relationship between 'open' in Open Educational Resources (OER) and 'open' in MOOCs is worth noting. A standard definition of OER reads: 'OER are teaching, learning, and research resources that reside in the public domain or have been released under an intellectual property license that permits their free use and re-purposing by others. Open educational resources include full courses, course materials, modules, textbooks, streaming videos, tests, software, and any other tools, materials, or techniques used to support access to knowledge.' By definition, Open Educational Resources fulfil the last two forms of openness.

Many of the educational resources included in MOOCs are anything but 'open' as defined in the final bullet point.

8   Traditional providers of distance learning

Naturally, open universities and private higher education institutions with an extensive history of offering distance learning have followed the recent developments in online education offered by 'regular' institutions, and have adopted a variety of positions in response. The closing declaration of the 2013 EADTU Higher Education Conference in Paris takes an interesting stance: 'The members of the European Association of Distance Teaching Universities are keen to take leadership in pedagogy-led European developments in this area and to work with the wider sector, using the expertise they have acquired in student-centred teaching and learning through online and other means, to ensure that teaching and learning in all European universities will reach the highest quality standards' (point 3 of the 'Message of Sorbonne', Paris, 25 October 2013).

This message has not been greeted with universal enthusiasm by 'regular' institutions. There have been some sceptical voices, resulting from less than positive past experiences in collaborative arrangements with distance learning universities. These critics also observe that American universities that have worked intensively on their online courses over the last five to ten years have more to offer 'regular' universities than do the open universities. Last but not least, universities of applied sciences and research universities in European

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[7]The following bullet point summary and subsequent paragraph are extracts from a letter from the Dutch Education minister on open and online higher education, dated 8 January 2014. Her description there is excellent.

countries, including Flanders and the Netherlands, have also raised standards in their online courses over the last decade.

The NVAO welcomes the fact that higher education institutions are learning from one another in this area and intends to follow the developments sketched above as closely as possible.

9 Students

For today's students, online and blended learning seem the most normal thing in the world, though of course MOOCs are a recent phenomenon for them too. While a large share of MOOC students in developed countries already hold prior higher education qualifications, for many of those in developing countries this form of education provides their first opportunity to participate in higher education (to the extent that their chosen MOOCs count as higher education).

Scenario 1 on page 7 of this memorandum cited the situation of a student enrolled in a bachelor's or master's programme at a research university or university of applied sciences in the Netherlands or Flanders who submits an 'exemption' or 'external course' request for online courses provided by another institution. The scenario as sketched there deals with internal and external quality assurance, but there is another aspect that is significant from the student's point of view, namely: How do I substantiate my request so as to maximise the chances of its being granted? The SURF Foundation's Open Education Special Interest Group assists Dutch (and other) students in substantiating their exemption requests for MOOCs with the best possible information, thereby generating a body of argument and precedence.

It is interesting to explore students' views on education that is offered completely or almost completely online. Those who opt for distance higher education via an open university or a private institution make their positive attitude clear with their choice. The student in Indonesia 'Skyping' a certification from Delft University of Technology is enthusiastic about this opportunity. Ordinary students are likely to prefer a combination of online and contact teaching; in other words, blended learning. But ordinary students too may come up against the limitations that the Dutch location rule imposes on the online and hence flexible provision of education. In a piece titled 'The Flexible Student', Jorien Janssen and Olga Wessels, chair and Board member, respectively, of the Dutch National Union of Students (LSVb) wrote on 19 February 2014: 'The Dutch location rule: an outmoded concept. Offering flexible learning is impossible when 2/3 of the teaching must take place at the institutional premises.'

In the section on 'E-Learning, open educational resources (OER) and massive online open courses (MOOCs)' in its 'Policy paper on the quality of higher education', dated 5 December 2013, the European Students Union (ESU) writes: 'ESU supports sharing digital learning resources (i.e. podcasts of lectures) and Open Educational Resource policies for improving the accessibility of educational resources. ESU also believes that MOOCs are an advantage for opening higher education to a wider group of students and reducing the barriers of participating in learning at a higher level. However, MOOCs should not be seen as a way to replace or reduce the availability of traditional learning.

'ESU believes that a common initiative within the EHEA should be developed for ensuring and enhancing the quality of this type of education provision, and the recognition of the achieved learning outcomes, while taking into consideration its specifics. A clear connection

between these means of education provision and the qualification frameworks based on the learning outcomes should be established.'

The NVAO takes an active interest in the developments and views outlined above.

10 The long and short term

The description and analysis in this memorandum relate to the current state of affairs and represent attempts to account for both longstanding and more recent developments. Predicting the future is a significantly more difficult task. Will less formal types of higher education gain ground? How will Open Educational Resources develop? The NVAO will continue its efforts to have expertise on online education in house, to keep this expertise up to date and to share it. In the case of two specific potential developments that lie closer to the core business of the NVAO, however, some cautious conjectures can be made.

Concern with online and blended learning at institutional level
The NVAO's focus on online and blended learning will, for the time being, continue primarily at individual course level. Though the Institutional Audit in the Netherlands and the Institutional Review in Flanders are not mentioned in our scenarios, to the extent that online and blended learning play a role at institutional level, they should be accounted for by these instruments.

Accreditation for MOOCs?
The NVAO grants accreditation to entire bachelor's and master's programmes. MOOCs are not directly subject to NVAO accreditation, and the NVAO deems it unlikely that MOOCs will be subject to accreditation in the Netherlands or Flanders in the foreseeable future. With reference to the five scenarios sketched above, the NVAO does however believe that the parties concerned may in time develop a shared view on what constitutes a 'good' MOOC. The NVAO would welcome the opportunity to take part in documenting and disseminating such good practices.

11 Positions

The NVAO is keen to explore the potential of MOOCs, online education in general and blended learning to strengthen the quality of programmes. The core of the NVAO's position is and remains as set out on page 5 of this memorandum. From an international perspective, the focus of activities lies within Europe, but the NVAO also takes a more global view.

The NVAO deems it crucial that expertise on online education is represented on assessment panels, and will ensure this is the case. Where necessary, the NVAO will provide experts with additional instruction on external quality assurance in relation to online and blended learning provision.

The NVAO considers it a duty to have expertise on online education in house, to keep this expertise up to date and to share it.

While they do not explicitly refer to online and blended learning, the assessment frameworks set out by the NVAO are well able to accommodate input relating to online education, given their open character.

The NVAO emphasises the crucial role of testing and examination, based on the points discussed in this memorandum under 'MOOCs and credits' (of particular significance in

scenarios 1 and 2) as well as in connection with the upcoming subdivision of Standard 3 (pertaining to testing and exit qualifications) in the Dutch framework for limited programme audits.

The NVAO's focus on online and blended learning will, for the time being, continue primarily at individual course level, but we will be keeping an eye on developments that would make it opportune to also include the institutional level.

Where MOOCs are concerned, the NVAO will clarify significant issues and scenarios for its stakeholders in the Netherlands and Flanders. This will include formulating elements of existing or potential good practice, to serve as an aid.

The NVAO maintains a current overview of legislation in the Netherlands and Flanders, incorporating implications for what is possible and permissible in the area of online higher education. The NVAO will continue to promote discussion of elements of this legislation where necessary and where they fall within our purview.

In international activities relating to online and blended higher education, the NVAO will maintain its European focus with activities of the kind described in this memorandum. One key priority will be to work bilaterally with our European sister organisations the ECA and ENQA to also examine legislation such as described in the previous paragraph at the European level and to take any necessary action. A further priority at the European level might be to call attention to the need for MOOC certificates that meet the highest standards and to how providers can facilitate this (scenario 5 in this memorandum).