

WSCUC: Institutional Approval for Distance Education

Background

In 2020 the government published an update to sections of the Code of Federal Regulations that addressed distance education (34 CFR § 600, 602, and 668). The update went into effect on July 1, 2021 and included a reworked definition of distance education.

Why This Matters

In 34 CFR § 668.8(m) the federal government informs schools that “An otherwise eligible program that is offered in whole or in part through telecommunications is eligible for title IV (funding) ... if the program is offered by an institution ... that has been evaluated and is accredited for its effective delivery of distance education programs by an accrediting agency.” As Westmont receives Title IV funds, if any part of the education we offer falls under the federal definition of distance education, then we must be accredited to deliver distance education or risk losing that funding.

What Changed

In the past distance education had more of a programmatic, all or nothing, definition. The following statement on the IPEDS website provides a good example of this understanding of distance education: “Courses and programs are considered DE (distance education) if **ALL** of their instructional portions can be completed remotely.”

The new understanding of distance education moves away from this all or nothing approach. The definition in 34 CFR § 600 states, “Distance education ... uses one or more of the technologies listed in paragraphs (2)(i) through (iv) of this definition to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.” [Note: The complete definition is below.] The definition connects distance education to instructional delivery instead of programmatic approach.

Result

For some time, schools have been able to receive “programmatic approval” for distance education programs through WSCUC. Typically these have been stand alone programs, like an online masters degree, in which 50% or more of instruction was delivered from a distance. In the past the occasional use of pedagogical approaches like remote instruction, flipped classroom, online review sessions, and others did not result in the receipt of a “distance education” moniker. With the new definition, that has changed.

As a result, WSCUC has created a new, second type of accreditation for distance education: “Institutional Approval.” Schools that had a WSCUC accredited distance education program were automatically granted institutional approval for distance education as they had already demonstrated a capacity to successfully support this type of learning. WSCUC is now encouraging all schools that did not have an approved distance education program to seek this new approval. Westmont does not have any programs approved for distance education.

Why This Matters Part II

Due to Covid-19 and the need to engage in remote learning, WSCUC was allowed to give temporary permission to all WSCUC schools to operate distance education programs. For the past few semesters, Westmont has regularly engaged in distance education and we are currently in compliance with 34 CFR § 600 because of this temporary approval. Without the approval, we will no longer be approved to utilize any instructional approach that falls within the definition of distance education; a single instance of any number of instructional decisions would put us outside of our accreditation and so jeopardize both our accreditation and eligibility for Title IV funding.

WSCUC Description of Distance Education

In a webinar for members, a WSCUC representative said simple things like allowing a student to attend a class meeting remotely or expecting students to watch an online, pre-recorded lecture will result in the course being labeled distance education and so require the WSCUC institutional approval. These practices and others that take advantage of technology and the internet have been used by Westmont faculty members for years.

To further state this new understanding, in a recent communication they said, “WSCUC understands that the Department will consider any program utilizing any distance education as a distance education program.”

The logical extension of this understanding is that if we do not have institutional approval for distance education, then we can not utilize any distance education strategies. A WSCUC representative described a school that does not have institutional approval as needing to offer instruction in a “100% face-to-face environment” (which is reminiscent of the college experience before technology invaded campuses).

Note: Programs that rely on distance education for 50% or more of content delivery must still gain and hold separate “program approval” for distance education through WSCUC. So, while “institutional approval” for distance education will allow faculty members to use a variety of instructional strategies that fall within the federal definition of distance education, it does not enable schools to simply roll out new online learning or distance education programs. Those must seek separate and individual approval through the WSCUC substantive change process.

Recommendation

Because the new definition of distance education applies to instructional decisions rather than programmatic decisions, it will tightly restrict the freedom of faculty members to choose from a variety of approaches to both instruct and support students. So, the President and Provost ask that we seek institutional approval for distance education.

Next Steps

WSCUC has created a new process for securing institutional approval for distance education that includes the submission of documentation supporting Westmont’s capacity to successfully

engage in this type of education. To ensure timely approval, WSCUC asks that this document be submitted by November 15, 2021.

Federal Government's Definition of Distance Learning

If curious, below is the definition of distance learning given in 34 CFR § 600.2. If faculty at Westmont want to use any instructional approach that lands within this definition, then we need to have institutional approval for distance education from WSCUC.

Distance education:

(1) Education that uses one or more of the technologies listed in paragraphs (2)(i) through (iv) of this definition to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously.

(2) The technologies that may be used to offer distance education include -

(i) The internet;

(ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;

(iii) Audio conference; or

(iv) Other media used in a course in conjunction with any of the technologies listed in paragraphs (2)(i) through (iii) of this definition.