



NASFAA 2004

NATIONAL CONFERENCE, MINNEAPOLIS 7.18.04 - 7.21.04

Helping Students Make it After All!





Distance Education





Overview of Presentation

- Background on DE Demonstration Program
- Title IV Issues Identified by Demo
- Areas of Possible Concern Related to Distance Education
- Proposed Legislation Concerning Distance Education



Distance Education Demonstration Program

- Authorized in 1998
- 15 participants selected in 1999
- 9 selected in 2001
- 5 selected in 2003
- Total of 107 individual institutions



Current Participants

- AIU
- Capella University
- College Court Reporting
- CT Distance Learning Cons
- Eastern Oregon Univ
- Franklin University
- Graceland University
- JesuitNET Consortium
- Jones International Univ
- Kaplan College
- LDS Church Ed System
- Marlboro College
- NTU
- Northcentral University
- ND University System
- Regis University
- Southern Christian Univ
- Texas Tech Univ
- US Sports Academy
- UMUC
- Univ of Phoenix
- Walden University
- Washington State Univ
- WGU



Former Participants

- Brevard Community College
- Community Colleges of Colorado
- Florida State University
- Masters Institute
- New York University
- Washington Community & Tech Colleges



Waiver Authority

- 50% Rules
 - Limitations on correspondence courses and students
 - Provision that defines a telecommunications course as a correspondence course
- Time Requirements
 - 30 week academic year
 - Definition of week of instruction
- Regulations, under General Provisions, that inhibit the operation of quality distance education programs



Examples of General Provisions Waivers Granted

- Correspondence student/halftime only
- Cost of attendance for correspondence student
- Application of a uniform SAP standard to all students within categories of students

Not authorized to waive any of the program-specific regulations



Title IV Issues Unique to Distance Education



Interrelation of 50% Rules & Eligibility (Institutional & Student)

- An institution becomes ineligible if, for the latest award year,
 - it offered more than 50% of its courses by correspondence, or
 - 50% or more of its regular students were enrolled in its correspondence courses.



Telecomm Courses = Correspondence Courses

- Telecommunications courses are considered to be correspondence courses if the sum of the telecommunications courses and other correspondence courses the institution provided equaled or exceeded 50% of the total number of courses it provided during the award year.



Telecomm Students = Correspondence Students

- For short-term certificate programs < 1 yr
- If the # of residential courses does not exceed the sum of telecommunications and correspondence courses
- If the institution provides certificate programs, but not degree programs
- If the institution provides more certificate than degree programs



Demo Schools Needing 50% Rule Waivers

- Capella University
- Charter Oak State College
- Eastern Oregon Univ
- Graceland Univ
- Jones International University
- NTU
- Northcentral Univ
- Southern Christian University
- UMUC
- Walden University
- WGU



Is the Program Telecomm or Correspondence?

- Title IV rules are tied to programs, not courses
- Institutions define their own programs
- Institutions may offer courses in various formats; students may mix formats to meet degree requirements.
- A program is defined by “prevailing delivery mode” – look at # courses & # enrollments



Example

- Program consists of 10 courses -- some required, some electives
- Institution offers 15 courses online and 5 courses by correspondence
- If total enrollments in online courses is greater than correspondence, this is a telecommunications program
- If correspondence enrollments are greater, this is a correspondence program



Effect of Type of Program

- Students enrolled in correspondence programs may not be considered more than half-time students
- For students in correspondence programs, COA is restricted to direct expenses except for during required period of residential training



Effect of Type of Program (cont)

- Timing of Title IV disbursements for correspondence programs is different
 - Before receiving an FSEOG payment, student must submit the first lesson
 - Before receiving a Pell payment, student must complete a specified percentage of lessons. Percentage varies on whether the program is term-based or nonterm-based.



Title IV Issues Not Unique to Distance Education



What is the Structure of the Program?

- Standard term – set beginning and ending dates
 - Semester term: 15 weeks; FT=12 sem credits
 - Quarter term: 10-12 weeks; FT=12 quarter credits
- Nonstandard term – set beginning and ending dates; does not meet standard term definition
- Nonterm – not organized in terms



Example: Eastern Oregon Univ

- Programs utilize two or more distance education delivery modes: Online, Interactive video, Videotape, Correspondence
 - Correspondence courses were self-paced; students had two quarters to complete
 - All other courses are offered in standard quarter terms
- EOU erroneously considered its programs to be standard term



EOU's Programs Were Nonterm

- Statistics revealed large numbers of students enrolled in correspondence courses in all the DE programs
- School had two options
 - Administer aid according to nonterm rules
 - Require Title IV recipients to complete correspondence courses in the same term in which they began them



Example: Northcentral Univ

- Virtual university – new to Title IV
- Self-paced courses that begin on the first day of each month
- Students have up to 16 weeks to complete a course
- No cohorts
- NCU's programs are **nonterm**



Two Challenges Facing NCU

- Tracking individual students to compare enrollment plan to actual behavior
- Providing a defensible definition of its academic year
 - Structuring courses with at least one scheduled instructional activity per week for each of the 16 course sessions
 - Gathering statistics on student behavior to see whether data support definition



Example: UMUC

- Goal to provide frequent start dates and to retain standard term model
 - Three standard 15-week terms
 - 8-week mini terms embedded
 - 15-week courses beginning half-way through the Fall and Spring semesters
 - January term for one-credit courses
 - Online and residential courses follow the same structure



UMUC Has Reached the Limit

- Twelve starts per year
- Mid-Fall term overlaps Spring term
- Mid-Spring term overlaps Summer term
- Enrollment in overlapping terms is included with the standard semester in which courses were begun
- Allowed only in cases where overlap is minimal



Program Offered in Different Term Structures

- Courses from one version of the program may be applied to other versions of the program
- Student may enroll in courses that have different term structures
- Challenge to determine which version of the program the student is enrolled in



Program Offered in Different Term Structures (cont)

- Examine past enrollment to determine which version of the program the student is enrolled in and administer aid according to rules for that structure
- If enrollment history is inadequate, look at the student's current enrollment mix to see which term structure is predominant



Year Round Enrollment

- Many institutions serving adults are using this model for degree programs
- University of Phoenix, Walden University and Capella University -- different models, same problem
- Title IV laws and regs do not address “continuous enrollment” for academic degree programs, only for clock hour programs of short duration



Competency-Based Programs Western Governors Univ

- Competencies tied to each program
- Assessments to demonstrate attainment of competencies
- Does not offer credits or courses
 - Students may enroll in courses offered by others
 - Academic Action Plan for each student
- Initially a “student-based model” – nonterm



WGU: Challenges

- Explaining the model
- Monitoring SAP
 - Standard set by dividing total # of assessments in program evenly over length of Academic Action Plan
 - Half-time student in a two-year program of 8 assessments should complete 2 per year
 - Each assessment does not represent the same amount of work
 - Problems with meeting SAP; retention



WGU Changes

- Limiting program start dates
- Establishing learning communities
- Stronger pre-assessments
- More standardized AAPs
- “Competency credits”
- All students are full-time
- Standard tuition every 6 months
- Nonstandard term



Areas of Possible Concern Related to Distance Education



Accrediting Agency Evaluation

- Responsible for academic quality assurance
- Institutional accreditors do not look at individual programs/courses
- Systems approach to evaluation
 - Regional accreditors work with WCET
<http://wcet.info/resources/accreditation>
- Small number of potential reviewers have thorough knowledge of DE



Rapid Growth

- Experience has shown this to be a significant risk factor
 - Need to look closely at financial situation
 - Outside pressures, particularly on for-profit entities
 - Administrative capacity to support large increases
- Accrediting agencies/Dept historically see growth as indicator of health



Diploma Mills

- Revival spurred by the Web
- Bogus accrediting agencies
- Dept of Education developing an affirmative list of schools accredited by agencies recognized by the Secretary



Proposed Legislation



Background

- Summer/Fall 2003 -- House passed bills on Teacher Education, International Education, Graduate Education
- Fall 2003 – McKeon bills dealing with Access and Affordability
- Late Fall 2003 -- S 1793 Senate Democrats
- May 2004 – HR 4283 “College Access and Affordability Act”. Hearings but no vote this year



HR 4283 – 50% Rules

- Telecommunicated instruction not defined as correspondence
 - No change in definition of telecommunications course
 - Television, audio or computer transmission, including open broadcast, closed circuit, cable, microwave, or satellite, audio conferencing, computer conferencing, or video cassettes or discs, except that such term does not include a course that is delivered using video cassette or disc recordings at such institution and that is not delivered in person to other students of that institution



HR 4283 – Demo Programs

- Distance Education Demonstration Program continued and expanded
 - Same limited waiver authority
 - Up to 100 participants; 5 participants correspondence schools
- College Affordability Demonstration Program
 - Up to 100 participants
 - Waivers of **any** HEA requirements and regs



HR 4283 – Accrediting Agency Requirements

- Specifies what must be included in review of distance education
 - Comparability of quality of DE education and student support services to that provided in classrooms/on campus
 - Evaluate how institution ensures integrity of student participation in DE programs



Other Aspects

- Loans and Pell Grants
- Transfer of Credit
- College Costs
- Consumer Information
- For-profits included in definition of IHE
- Eliminating 90/10 rule
<http://thomas.loc.gov>



Comments, Feedback and Contact Information

Kay Gilcher

Phone: 202-502-7693

Fax: 202-502-7873

Email: kay.gilcher@ed.gov

Cheryl Leibovitz

Phone: 202-377-4028

Fax: 202-275-4552

Email: cheryl.leibovitz@ed.gov