WHO REGULATES OUR OFFERING OF ONLINE COURSES?

Federal regulations (Title 34) control the “rules and procedures that the Secretary uses to determine whether an educational institution qualifies in whole or in part as an eligible institution of higher education under the Higher Education Act of 1965.\textsuperscript{1} The regulations updated in 2010 define the credit hour, online education, accessibility requirements, and more recently the “last day attended” in online courses.

WHAT ARE THE REQUIREMENTS OF DISTANCE EDUCATION?

The new regulations in 2010 made clear a distinction between “correspondence courses” and “distance education.” They defined a correspondence course as: “A course provided by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. Interaction between the instructor and student is limited, is not regular and substantive, and is primarily initiated by the student.

A correspondence course is not distance education.”

Distance education is comprised of learning experiences using the same media, but it has to “support regular and substantive interaction between the students and the instructor” with interaction primarily initiated by the instructor.\textsuperscript{2}

Communication and Interaction:

So, how do we know if we meet federal guidelines about interaction?

Interaction complies by being:

- **Regular** -- built into the syllabus and course structure as taking place as scheduled and repeated events
- **Substantive** -- containing important meaning or value in sufficient quantity to establish instructor presence and affect learning outcomes
- **Instructor Initiated** -- Created, instigated, arranged, maintained, or proposed by the instructor

If the course consists entirely of reading the text and assessment, it is considered a correspondence course.

“Research has shown that online courses that lack substantive and meaningful interaction, coupled with a sense of presence...contribute to a sense of isolation, unsatisfying learning experiences, and high dropout rates.”\textsuperscript{3}

WHAT ARE THE REQUIREMENTS OF AN ONLINE COURSE?

Content and Time Equivalency to Face-to-Face Courses:

An online course should involve “an equivalent amount of instruction and student work leading to equivalent learning outcomes, as required for an on-campus class.”\textsuperscript{3} Distance education courses are held to the federal definition of a credit hour (Title 34 §600.2 Definitions).

The same level of active engagement as face-to-face courses would require (by our university and state definition) one weekly 50 minute session per credit hour for at least 15 weeks.\textsuperscript{4}

Of course, there is an expected amount of work outside direct interaction in both online and face-to-face environments. For example, text reading is done outside of face-to-face meetings. This same time requirement should be indicated in course materials and/or the syllabus.
Accessibility:
The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 (§504) prohibit postsecondary institutions from discriminating against individuals with disabilities. This pertains to all communication, including websites and course material. "It the responsibility of the distance learning course provider to make sure that users with disabilities who use assistive technology have access to the web-based information."5

There are some simple ways to make our courses more accessible to everyone. These include:
- Adding brief and appropriate alternative text tags to images and graphics
- Explaining the main gist of charts, screenshots, or visual aids with text below or above the graphic
- Using heading styles present in Word documents, PDFs, and Canvas to establish content hierarchy
- Transferring content from Word and PDF documents to html content (Canvas) pages
- Inserting "clean" hyperlinks (indicating the link content with text, not pasting in URLs)

Eventually, we will need to offer transcripts and captions for videos and Flash content, which will be more time and resource intensive.

Reporting of Attendance:
One change is in reporting last date of attendance. "Previously, institutions could use the last date on which an online student logged in to the institution’s learning management system or online course as the withdrawal date and could calculate how much of the student’s financial aid to return to the department on that basis. Now an online student has to have actively participated in an academically meaningful class or faculty discussion for an online contract to qualify in establishing in establishing the last date of attendance."6

Thus, early assignments and activities help to establish that a student is active and participating. If the first assignment is not due for weeks, participation cannot be proven.

HOW DO WE ASSURE THAT OUR ONLINE COURSES COMPLY?
At WNMU, it is the role of the instructor to develop and present content online equivalent to the rigor of traditional face-to-face courses. The Department Chair or Dean helps ensure that programs and courses meet federal guidelines.

The Extended University and Virtual Campus, which administer the Learning Management System, oversees effective and efficient content delivery.

Sources:
1. Electronic Code of Federal Regulations Title 34 §600.1 Scope. Retrieved from http://www.ecfr.gov/cgi-bin/textidx?c=ecfr&SID=69aa529f04f78fe6c1d9b9b665316d06&rgn=div8&view=text&node=34:3.1.3.1.1.1.23.1&idno=34
2. Electronic Code of Federal Regulations Title 34 §600.2 Definitions. Retrieved from http://www.ecfr.gov/cgi-bin/textidx?c=ecfr&SID=69aa529f04f78fe6c1d9b9b665316d06&rgn=div8&view=text&node=34:3.1.3.1.1.1.23.2&idno=34

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Douglas Thomas and John Seely Brown, A New Culture of Learning

"We feel the leaders of the 21st century are going to be the ones who can ask the best questions and drive things forward. The kinds of questions we are talking about lead to outcomes and those also provide a kind of verification as to whether the questions are good ones or not."

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CHECKLIST FOR ONLINE COURSES
FEDERAL GUIDELINES CHECKLIST FOR ONLINE COURSES

Course Name and CRN  ________________________________________
Reviewer   ________________________________________
Date    ___________________________

Communication and Interaction
☐ Regular interaction is scheduled in the course structure and syllabus.
☐ Interaction is designed to offer important meaning or value to student experience and affect learning outcomes.
☐ There is a sufficient quantity of interaction to establish instructor presence.
☐ Student engagement surpasses reading the text and completing assessments.

Content and Time Equivalency to Face-to-Face Courses
☐ There are about three hours of direct engagement with instructor, activity, or peers built into each week (not including reading and study time expected outside the Learning Management System.
☐ The time investment expected is presented clearly in the course syllabus and/or course introduction pages.

Accessibility
☐ Images and graphics (as well as charts, screenshots, and visual aids) have appropriate alternative text tags which explain the purpose within content.
☐ Graphics, charts, and visual aides have a text explanation of the content offered below or above them.
☐ Word documents, PDFs, and Canvas pages use heading styles (not simply resized text) for emphasis and content hierarchy.
☐ Use of linked PDFs and Word documents is not excessive (content is mainly in Canvas pages).
☐ Hyperlinks in pages and modules are not URLs, but text indicators of the content or purpose of the link.

Attendance Reporting
☐ There are activities of some kind in the first weeks of class to establish participation.