

## **Executive summary**

This document explains the definitions of distance education used by regulatory agencies and the University of Missouri (UM) System administration to:

- track distance education courses, programs, and students and
- ensure UM's compliance with federal regulations, accreditation standards, and university policies.

Moreover, this document provides the relationships between distance education definitions and the coding used with the UM System's information systems for students and courses at each university within the UM System.

# 1. Definitions

This section explains the definitions of distance education used by UM System administration to track distance education courses, programs, and students and to ensure UM's compliance with federal regulations, accreditation standards, and university policies. Please refer to Appendix 1 for the definitions used by regulatory agencies and accrediting bodies.

The UM System follows the Higher Learning Commission (HLC)'s definitions of distance education; the HLC is the accrediting body that accredits each university within the UM System (refer to Appendix 1 for more details).

## 1.1. Distance Education

The term “**distance education**” is defined as education that uses one or more technologies to (1) deliver instruction to students who are separated from the instructor and (2) support regular and substantive interaction<sup>1</sup> between the students and the instructor, either synchronously or asynchronously. Technologies used for instruction may include the following: Internet, one-way and two-way transmissions through open broadcasts, closed circuit, cable, microwave, broadband lines, fiber optics, satellite or wireless communication devices, audio conferencing, video or video conferencing, cassette, DVDs, and CD-ROMs, if the cassette, DVDs, and CD-ROMs are used in a course in conjunction with the technologies listed above.

The term “**online education**” is defined as a subset of distance education that uses Internet technologies to provide more flexible access to content and instruction at any time, from any place. In online education, instructional content is intentionally designed and delivered either asynchronously or synchronously on the Internet to replace classroom instruction time (contact hours) between the student and instructor.

- **Distance-delivered course:** The UM System defines a *distance-delivered course* as a course in which at least 75 percent of the instruction and interaction occurs via electronic communication or equivalent mechanisms, with the faculty and students physically separated from each other. Typically, for courses within the UM System, this interaction occurs over the Internet.
- **Distance-delivered program:** The UM System defines a *distance-delivered program* as a certificate or degree program in which 50 percent or more of the required courses may be taken as distance-delivered courses.
- **Distance education course:** The UM System defines a *distance education course* as one in which **75% or more** of the instruction is offered by distance education.

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<sup>1</sup> Interactions that are considered “regular and substantive” satisfy at least two of the five following conditions: providing direct instruction; assessing or providing feedback on a student's course work; providing information or responding to questions about the content of a course or competency; facilitating a group discussion regarding the content of a course or competency; or other instructional activities approved by the institution's or program's accrediting agency. Retrieved from <https://www2.ed.gov/policy/highered/reg/hearulemaking/2018/distanceandinnovationfactsheet.pdf>

- **Distance education program:** The UM System defines *distance education programs* as programs that meet all the following 3 conditions:
  - That 50% or more of the program is offered by distance education AND
  - That have notified the Missouri Department of Higher Education and Workforce Development (MO DHEWD) that they intend to be offered in the online modality<sup>2</sup> AND
  - That have approval from their universities.<sup>3</sup>
- **Online course:** The UM System defines an *online course* as a distance education course in which the instruction and interaction is delivered specifically via the Internet, as opposed to close-circuit television, open broadcasts, etc., for the distance-delivered portions. To determine what percentage of a course is online, divide the number of classroom (in-person) contact hours replaced by instruction designed and delivered online by the total number of contact hours required for the course.
- **Online program:** The UM System defines an *online program* as a distance education program that is delivered specifically via the Internet for the distance-delivered portions.
- **Online student:** The UM System defines an *online student* as a student whose primary program is offered online or at a distance. The student is admitted to an online program, may take any type of course, but overall must maintain 51% or more credit hours in online/distance mediated courses. A student will not be changed semester to semester, but will be monitored and need to adjust their course load if they fall below the 51% or more over two major semesters. A student admitted to both a campus and a distance program will have the designation of the program with the highest academic level. The academic level hierarchy is defined as doctorate, educational specialist, master's, graduate certificate, graduate post-baccalaureate, undergraduate degree, undergraduate certificate, undergraduate non-divisional. For example, a student in a campus master's program and online graduate certificate program would be a campus student since master's supersedes a graduate certificate. If a student is admitted to two programs of the same level, one campus and one online, the student will have the designation of campus student. Please note, this is different from an online course-taker.
- **Online course-taker:** The UM System defines an online course-taker is a student who is enrolled in an online course.

## 1.2. Correspondence education

The term “**correspondence education**” is used to describe education provided through one or more courses 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 the student is limited, is

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<sup>2</sup> For accreditation purposes, all programs in which 50 percent or more of the required courses may be taken as distance-delivered courses are reported as distance programs to the HLC to meet their requirements. However, unless the program has received approval from MO DHEWD, they are not counted as distance education programs by the UM System for our internal operations.

<sup>3</sup> Individual universities may have additional requirements beyond these for a program to be considered an online program for operational purposes, such as inclusion in System-wide marketing efforts, on the Missouri Online website, etc.

not regular and substantive, and is primarily initiated by the student. Correspondence courses are typically self-paced. Correspondence education is *not* distance education.

- **Correspondence education course:** The UM System defines a correspondence education course as one in which 75% or more of the instruction is offered by correspondence education. Within the UM System, these courses are often referred to as self-paced courses.

### **1.3. Differentiating between Distance and Correspondence Education Programs**

To determine whether a *program* is offered via distance education or correspondence education, divide the number of distance education courses or correspondence education courses in the educational program by the total number of courses in the program. This should yield the percentage of distance or correspondence education offered in that program.

- If the result is that 50% or more of the program is offered by distance education, the program is a distance education program.
- If the results are that 50% or more of the program is offered by correspondence education, the program is a correspondence education program.
- If the program has a combination of distance and correspondence education courses that together add up to 50% or more, then list the program in the category that represents the largest percentage.

## 2. Compliance Issues

### 2.1. Federal Title IV Regulations

In order to be eligible for Federal Student Aid (FSA), the UM System must comply with federal Title IV regulations (see Appendix 1).

#### 2.1.1. Distance Education Program FSA Eligibility

A distance education program at a domestic school is considered an eligible FSA program if it has been accredited by an accrediting agency recognized by the U.S. Department of Education for accreditation of distance education. The HLC is recognized by the U.S. Department of Education for accreditation of distance education.

### 2.2. U.S. Department of Veterans Affairs

The U.S. Department of Veterans Affairs (VA) enrollment certification rules require that enrollment be broken out by *in-residence* versus *distance education courses*. Certifying officials must know which courses will meet the VA definition of in-residence courses – all others are classified as distance education courses for VA purposes. See Appendix 1 for the definitions.

**The distinction between “in-residence” and “distance” training can determine how much housing allowance a student is entitled to receive.** Therefore, definitions of instructional modality in the schedule of courses or other data sources must be consistent and reliable to assure compliance with VA definitions when reporting enrollment data.

### 2.3. U.S. Department of Homeland Security

The U.S. Department of Homeland Security regulations require institutions to ensure that an international student is primarily studying at a physical location on campus for the preponderance of their education (i.e., at least nine credits per semester for an undergraduate must be onsite).

#### 2.3.1. Implications

- The UM System should not issue SEVIS I-20's to international students for F-1 visa purposes for degree programs in which a student cannot complete the program physically onsite/on-campus.
- International Services needs clear identification of course (class) attributes to determine if a specific course section should be considered as distance education for immigration compliance purposes.
- Similarly, the international admission offices need to know if an academic program and/or academic plan are sufficiently onsite/on-campus to be a visa-eligible option for the student.

# APPENDIX 1. DEFINITIONS

## 1. Integrated Postsecondary Education Data System (IPEDS)

IPEDS is the data system required by the United States Congress for use by the United States Department of Education and the National Center for Education Statistics.

### 1.1. Distance Education

The term “distance education” is defined by IPEDS as education that uses one or more technologies to (1) deliver instruction to students who are separated from the instructor and (2) support regular and substantive interaction<sup>4</sup> between the students and the instructor, either synchronously or asynchronously. Technologies used for instruction may include the following: Internet, one-way and two-way transmissions through open broadcasts, closed circuit, cable, microwave, broadband lines, fiber optics, satellite or wireless communication devices, audio conferencing, video or video conferencing, cassette, DVDs, and CD-ROMs, if the cassette, DVDs, and CD-ROMs are used in a course in conjunction with the technologies listed above.

- **Distance Education Course:** A course in which the instructional content is delivered exclusively via distance education. Within the UM System, this includes courses typically referenced as “online courses.”
- **Distance Education Program:** A program for which the required coursework for program completion can be completed via distance education courses. Within the UM System, these programs are often referred to as “fully online programs.”

## 2. Federal Title IV Regulations

In order to be eligible for Federal Student Aid (FSA), UM System must comply with federal Title IV regulations (see Appendix 1). Given the federal source of both Title IV regulations and IPEDS, the Title IV definitions for distance education are very similar to IPEDS definitions.

### 2.1. Distance Education Definitions

Federal Title IV regulations define distance education as education that uses certain technologies to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor. The interaction may be synchronous (student and instructor are in communication at the same time) or asynchronous. The technologies may include:

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<sup>4</sup> Interactions that are considered “regular and substantive” satisfy at least two of the five following conditions: providing direct instruction; assessing or providing feedback on a student’s course work; providing information or responding to questions about the content of a course or competency; facilitating a group discussion regarding the content of a course or competency; or other instructional activities approved by the institution’s or program’s accrediting agency. Retrieved from <https://www2.ed.gov/policy/highered/reg/hearulemaking/2018/distanceandinnovationfactsheet.pdf>

- the Internet,
  - audio conferencing, or
  - one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices.
- **Distance education course:** Federal Title IV regulations define a distance education course as a course in which the content is delivered exclusively through distance education. A course taught through video cassettes or discs is also considered a distance education course, but only if one of the three technologies listed is used to support interaction between the students and the instructor.

### 3. U.S. Department of Veterans Affairs

U.S. Department of Veterans Affairs (VA) enrollment certification rules require that enrollment be broken out by *in-residence* versus *distance education courses*. Certifying officials must know which courses will meet the VA definition of in-residence courses – all others are classified as distance education courses for VA purposes.

- **In-residence training for undergraduate students:** VA defines *in-residence courses* for undergraduate students as those that consist of regularly scheduled, standard course sessions (at least once every two weeks). The total number of hours of classroom instruction (based on 50 minutes of instruction per hour) must be equal to or be greater than the number of credit hours awarded for the course multiplied by the number of weeks in the term.
- **In-residence training for graduate students:** VA defines *in-residence courses* for graduate students as those that consist of at least two regularly scheduled standard class sessions per term, research (either on or off campus), or a combination of both. (See 38 CFR 21.4267(d)).
- **Distance training:** VA defines *distance training courses* as any course that does not meet the VA definition of in-residence training.

### 4. Higher Learning Commission (HLC)<sup>5</sup>

The HLC is the accrediting body that accredits each university within the UM System. In some cases, the HLC provides definitions regarding distance education, while in other cases, it uses the IPEDS definitions. Institutions must properly distinguish their distance and correspondence education using the *federal* definitions from IPEDS. **The federal definition's critical distinction is whether or not the courses are self-paced, and the interaction with faculty is student-initiated.** Courses of this nature are correspondence education, regardless of whether they are delivered electronically or through any other mechanism. The U.S. Department of Education has informed the HLC that it is looking closely at whether institutions have properly

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<sup>5</sup> Retrieved from <http://ncahlc.org/>

made this identification and whether the HLC has reviewed the identification and that there may be Title IV consequences for institutions that have not adequately made this identification.

#### **4.1. Distance Education**

The term “distance education” is defined by the HLC in the same way it is defined by IPEDS (see above).

- **Distance-delivered course:** The HLC defines a distance-delivered course as a course in which at least 75 percent of the instruction and interaction occurs via electronic communication, correspondence, or equivalent mechanisms, with the faculty and students physically separated from each other.
- **Distance-delivered programs:** The HLC defines a distance-delivered program as a certificate or degree program in which 50 percent or more of the required courses may be taken as distance-delivered courses.
- **Distance education course:** The HLC defines a distance education course as one in which 75% or more of the instruction is offered by distance education.
- **Distance education program:** The HLC defines distance education programs as programs where 50% or more of the program is offered by distance education.

#### **4.2. Correspondence education**

The term “correspondence education” is used by the HLC to describe education provided through one or more courses 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 the student is limited, is not regular and substantive, and is primarily initiated by the student. Correspondence courses are typically self-paced. Correspondence education is *not* distance education.

- **Correspondence education course:** The HLC defines a correspondence education course as one in which 75% or more of the instruction is offered by correspondence education. Within the UM System, these courses are often referred to as self-paced courses.

#### **4.3. Differentiating between Distance and Correspondence Education Programs**

To determine whether a *program* is offered via distance education or correspondence education, divide the number of distance education courses or correspondence education courses in the educational program by the total number of courses in the program. This should yield the percentage of distance or correspondence education offered in that program.

- If the result is that 50% or more of the program is offered by distance education, the program is a distance education program.
- If the results are that 50% or more of the program is offered by correspondence education, the program is a correspondence education program.

- If the program has a combination of distance and correspondence education courses that together add up to 50% or more, then list the program in the category that represents the largest percentage.

New HLC definitions also require the reporting of in-person independent/directed study courses, weekend college (if offered), and internship/practica.

## 5. Missouri Department of Higher Education and Workforce Development (MDHEWD)

MDHEWD currently recommends following the IPEDS definitions for distance education and related terms; however, it does provide specific definitions around usage for those terms, particularly for program approval processes. Those definitions are given below, specifically for that context.

### 5.1. Distance Education

MDHEWD defines distance education as a general term for any type of educational activity in which the participants are at a distance from each other—in other words, are separated in space. They may or may not be separated in time (asynchronous vs. synchronous). This can include both education opportunities provided for credit by public out-of-state postsecondary institutions through online education services, as well as those opportunities provided for credit that postsecondary institutions provide outside their primary campus in multiple states.

- **Off-site Delivery of Existing Program:** MDHEWD defines “off-site delivery” of existing degree programs as delivery of certificate and degree programs to students at remote sites within the state of Missouri; specifically, this definition refers to those programs that involve primarily synchronous delivery through the use of traveling faculty, remotely located faculty, and/or the use of two-way interactive video.
- **Web-based Courses and Programs:** MDEWD defines “web-based courses and programs” as asynchronous courses and/or programs delivered in an Internet, website environment, through satellite transmission or via distribution of audiovisual and/or print material.

### 5.2. Online Education

MDHEWD defines online education as A type of learning in which instruction and content are delivered primarily over the Internet. The term does not include printed-based correspondence education, broadcast television or radio, videocassettes, and stand-alone educational software programs that do not have a significant Internet-based instructional component. Used interchangeably with Virtual learning, Cyber learning, e-learning.

- **Online course:** MDHEWD defines an “online course” as any course offered over the Internet.



