Whitworth University Distance Education Policy

This document serves as a guide for academic leaders and programs when they are developing new distance education programs or considering changes to existing distance programs. The criteria explained below are necessary to ensure Whitworth University is adhering to both federal regulations and the distance education policies of our institutional accrediting agency, the Northwest Commission on Colleges and Universities (NWCCU).

The Department of Education has announced new regulations defining distance education under its Distance Education and Innovation rules. The revised language in CFR Title 34 Subtitle B Chapter VI Part 600 Subpart A (§ 600.2 Definitions), which went into effect July 1st, 2021, defines distance education as “(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.”

NWCCU defines a distance education program as any program in which a student can complete 50% or more of the degree program or certificate through distance learning modalities. In order to be included under our accreditation status with NWCCU, the first three distance education programs offered by an institution must be approved through a major substantive change proposal for distance education authorization. Additional distance programs are then treated like any other new program through the NWCCU proposal and notification process, but all must still be approved prior to being implemented.

Approval Process for Distance Education Programs

New Programs

New program proposals in which students can complete 50% or more of the program degree or certificate requirements through distance-learning modalities must be reviewed. These program proposals will be routed through the area Dean to the Provost and Dean’s Council. If the program is designed to grow enrollment and requires additional resources and personnel, the Provost will send the proposal for review by the Strategic Enrollment Plan (SEP) Implementation Team and Cabinet. If a new program will have little to no impact on university resources and infrastructure, then the program leaders may submit their proposal through their area Dean directly to Dean’s Council and the Provost only for review. Once approved at the administrative level, the new program must then be submitted for faculty approval through the Undergraduate Education Curriculum Committee (UECCo) or the Graduate Education Curriculum Committee (GECCo), which will use the standard proposal process for any new program. The COVAC or GECCo chair will bring the committee’s recommendation to the Faculty Assembly for a vote. Once the faculty approves the new program, a substantive change proposal, or
notification if the new program is not a significant departure from current offerings, will be submitted by the Director of Accreditation and Assessment to NWCCU.

Existing Programs
Existing programs that want to offer the exact same program through distance learning modalities in which a student can complete 50% or more of the program requirements through distance-learning do not have to seek Faculty Assembly approval. However, these programs should still submit a new program proposal through their area Dean to the Provost for consideration in Dean’s Council. If the move of an existing program to remote-learning modalities will have significant impact on university enrollment and resources, then it may also need to be reviewed by the SEP Implementation Team and Cabinet. Upon approval by Dean’s Council and the Provost’s office, a program change proposal should be submitted to UECCo or GECCo to request the change in modality. Upon curriculum committee approval the Director of Assessment and Accreditation will submit a notification to NWCCU for inclusion of the program as a distance-learning program under our accreditation status. Any curricular changes to an existing program to allow for distance-learning education must still be approved by UECCo or GECCo through a program change proposal and course proposal for new courses. If the curriculum in the program changes by 25% or more, then it is no longer a notification to NWCCU but a substantive change request.

Distance Learning Program Requirements

There are many requirements that Whitworth distance education programs must meet in order to be compliant with federal regulations and the NWCCU distance education policy. All new and existing distance education programs must follow these criteria.

   Distance Learning Programs
   Any degree or certificate program in which 50% or more of the required credits can be completed through distance-learning modalities by a student must be approved as a distance-learning program by Dean's Council, the Provost and NWCCU (see approval process above) and adhere to federal and NWCCU policies on distance learning. Any program that is advertised to students on the website or in the catalog as a distance-learning program must always provide at least 50% of its required coursework through distance-learning modalities. If a program is offered both face-to-face and by distance-learning, that should also be made clear to prospective students.

   Mission Alignment
   All distance-learning programs must demonstrate alignment with Whitworth’s mission and core themes in order to be approved by NWCCU for inclusion under our accreditation status.
State Authorization
Whitworth University must have state authorization to deliver distance education programs to students located outside of the State of Washington. We are currently a member of NC-SARA, which is a state authorization reciprocity agreement. It allows us to deliver distance education across state lines to other NC-SARA member states. Currently, 49 states, Puerto Rico, the U.S. Virgin Islands, and the District of Columbia are NC-SARA members. California is the only state that does not participate in NC-SARA; however, California does not currently require us to seek degree authorization in their state. The Director of Assessment and Accreditation will maintain our NC-SARA membership and will notify the registrar and distance programs if there are changes to NC-SARA policies and participating member states.

Required Federal and State Authorization Reporting
Both IPEDS and NC-SARA require annual reports of the total number of students who are enrolled in distance education courses and the total number of students who are enrolled exclusively in distance-learning education courses. Thus, all 100% remote classes must have the online (OL) designation set with the registrar for their instruction method and ideally also have an “OL” section number attached to them for tracking purposes. Out-of-state learning placements (such as internships, clinical placements, field experiences, etc.) must also be tracked and reported. If a distance-learning program is making learning placements outside of the State of Washington, and the program is not setting up these placements through our internship office in Career Services, then those placements must be reported to the Director of Assessment and Accreditation every spring for the previous calendar (Jan-Dec) year.

Disclosures
Distance education programs are required to make the same disclosures as our regular on-campus programs, many of which can be found on our consumer information pages. Additionally, all programs that lead to state certification and/or licensure must notify prospective students located outside of the State of Washington that the program “meets,” that it “does not meet,” or that we “have not determined” if the program meets requirements for licensure in their state. If the disclosure is “have not determined,” then distance education programs must additionally provide the student with the contact information for the appropriate licensing agency in their state. Licensure disclosures must be posted publicly on our disclosure website and must also be made individually in writing to students. Any distance education programs leading to state certification or licensure should coordinate with the Director of Assessment and Accreditation to determine how these individual notifications will occur.

Physical Location
NC-SARA requires us to disaggregate and report student enrollment data for exclusively online students. There are many reasons why an exclusively online student may be physically located somewhere other than the “home state” on file with the registrar’s office. Therefore, faculty teaching online classes must include the statement on “Physical Location” found in the “Required Syllabus Elements for Online Courses” document posted on the Academic Affairs Forms & Resources website. This statement will direct students who are exclusively online that term to complete the “Physical Location Tracking Form” found on the Master Forms list if they
will be located somewhere other than their home state. Otherwise, Whitworth will assume exclusively online students are located in the home state on file with the registrar’s office.

**Authentication**

CFR Title 34 Subtitle B Chapter VI Part 600 Subpart B §602.17(g)(h) requires institutions to “have processes in place through which the institution establishes that a student who registers in any course offered via distance education or correspondence is the same student who academically engages in the course or program.” The same regulation also requires that the institution “makes clear in writing that institutions must use processes that protect student privacy and notify students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.” Upon being accepted into a specific program, Whitworth students are issued a login, a password, and an email account. Access is granted only after the student has completed and provided all necessary elements of the application package. Student-identity information on application materials must be consistent with other information the student provides to areas such as financial aid. Students are required to authenticate their identity using their login and password during their course enrollments as well as through Pirate Port, Whitworth email, Blackboard, and Self-Service. Multi-factor authentication (MFA) is also required for off-campus access of these systems. Students must adhere to the Computer-User Responsibility Agreement published in the Student Handbook and follow the [Acceptable Use Standard Policy](#) published by Information Systems, which prohibits the sharing of passwords and accounts. This policy and others ensure privacy and security of electronic information and are described in full on our [Information Systems’ Policies website](#).

In addition to computer and user account authentication, distance-learning programs are encouraged to use other means of authentication at the course level to ensure that the student enrolled in the program is the same student that is being engaged in the course. Beyond email and our LMS system, this may include use of video conferencing platforms, video recorded assignments, or an online proctoring system. For example, the university has contracted with Respondus to implement LockDown Browser and Respondus Monitor for its online proctoring system. Respondus provides an automated service to capture video and student ID information for validation of identity. There is currently no additional cost to the students for proctored exams through Respondus. If a distance-learning program adopts any additional identity verification systems or processes that would be charged to students, those costs must be disclosed to the student upon enrollment.

**Attendance**

It is very important to track “attendance” of students in any distance-learning course. This is required for proper disbursement of Title IV funds and may need to be reported in our annual financial aid audit. “Attendance” in a distance-learning course can be evidenced through academic engagement in the course. Newly proposed definitions in CFR Title 34 Subtitle B Chapter VI Part 600 Subpart A (§ 600.2 Definitions), that went into effect July 1st, 2021, define academic engagement as any of the following:
(i) Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;

(ii) Submitting an academic assignment;

(iii) Taking an assessment or an exam;

(iv) Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;

(v) Participating in a study group, group project, or an online discussion that is assigned by the institution; or

(vi) Interacting with an instructor about academic matters

All instructors teaching a distance-learning class must regularly utilize Blackboard, our LMS system, to help document student engagement. This can be done using “Assessments” such as “Tests” and “Assignments” or “Tools” such as “Discussion Board”, “Blogs”, and “Journals”. Student engagement for all students can then be exported using the “Single Course User Participation Report”. In addition, gradebooks should be exported and archived at mid-term and end of term. Evidence of student engagement can be uploaded to the Student Engagement Archive on Sharepoint. Program chairs and directors are responsible for ensuring their faculty are collecting and archiving evidence of engagement for 100% remote-instruction classes.

Quality, Rigor, and Assessment

All distance-learning programs must demonstrate the same quality and rigor as Whitworth’s face-to-face programs. New programs must seek UECCo or GECCo approval (see approvals above) and demonstrate that the program has acceptable quality and rigor. Existing programs must keep the same quality and rigor as the face-to-face counterpart. All distance-learning programs must have established Student Learning Outcomes (SLO’s), must have an assessment plan, and must undergo periodic review by the Teaching, Learning, and Assessment Committee (TLAC). If a distance-learning program shares learning outcomes and an assessment plan with the face-to-face program, then a single annual assessment report may be submitted to TLAC; however, the program must include assessment of both face-to-face courses and distance-learning courses in that assessment and must compare results between the two modalities to demonstrate an equivalent learning experience is obtained.

Student Access to Resources

Students in distance-learning programs must have the same or equivalent access to student services and resources as our face-to-face students. If a distance-learning program includes courses that have special resource or facility needs for face-to-face students, a case must be made to show that the experience for distance-learning students is equivalent.

Publication

All publications for distance-learning programs must correctly represent the program and adhere to the NWCCU advertisement policies. No distance-learning program may publicize and
recruit students until NWCCU approval has been obtained to include the program under Whitworth’s accreditation status.

**Contractual Relationships**

Any contractual relationships or arrangements with consortial partners to deliver program content on behalf of the university must be clear and guarantee that the institution maintains direct and sole responsibility for the academic quality of the distance-program delivered. All such arrangements must be reported to NWCCU as a substantive change and must not be 50% or more of a program.

**Required Faculty Training Teaching Distance and Online Courses**

All faculty who teach online and distance-learning courses must meet quality and rigor standards for online courses at Whitworth. It is the program director or department chair’s responsibility to make sure faculty receive appropriate training for any online courses offered.

Any Whitworth faculty who are designing a new online course, and who have not taught an online course before at Whitworth, must go through a 2-4 week training course with an Instructional Designer in Instructional Resources; as part of the course, the faculty member must consult regularly with the instruction designer. Program directors and department chairs should contact their area Dean to make arrangements for this training. The 2-4 week training includes an online training course through BlackBoard, in which instructors create the first module of their course using the Instructional Resources’ approved template for online courses. Regular follow-up with the Instructional Designer is expected upon completion of the training course and during the term when the online course is taught for the first time. Program directors and department chairs are responsible for ensuring that this regular consultation occurs between the instructor and Instructional Designer.

Any Whitworth faculty who have not previously taught an online course at Whitworth and are inheriting a previously developed online course must also consult with an Instructional Designer for individual training. These faculty are given access to a self-paced version of the online training course but are required to use the inherited online course template that would have been designed previously using Whitworth’s standards and templates for online courses.

Whitworth’s templates for online courses are designed to follow recommendations by the Online Learning Consortium (OLC) Quality Scorecard. Program directors and department chairs are encouraged to use the OLC rubrics, which are available through Instructional Resources, when performing evaluations of instructors teaching online courses. Any distance-learning course which undergoes major revision or updating must be reviewed by an instructional designer as well as a content expert in the discipline.

**Online Courses in Non-Distance Education Programs**

Online courses may be taken by students in non-distance learning programs; however, no student may take 50% or more of their required degree or certificate coursework remotely unless the program has been approved by NWCCU as a distance-learning program. Thus, it is the responsibility of faculty advisors in non-distance-learning approved programs, with assistance from the registrar, to track this requirement for their advisees to ensure they do not take 50% or more of their classes online.
Any instructor teaching an online or distance-learning course must follow course-level distance-learning program requirements and faculty training as described above.