

Questions for Conference Call with COE Staff

March 23, 2020, 2 pm

1. What is COE's definition of distance education?

The Council's definition (Handbook of Accreditation, 2019 edition, p. 86) is "an education delivery method that uses one or more technologies to provide instruction to students who are separated from the instructor; and support regular and substantive instruction between students and the instructor, synchronously or asynchronously." I highlighted part of this because it becomes an important distinction when discussing distance education. The Department's MAR 5 memo mentions several optional technologies (including email and "chat features"), but the memo specifically states "instructors must initiate substantive communication with students either individually or collectively, on a regular basis. In other words, an instructor could use email to provide instructional materials to students enrolled in his or her class, use chat features to communicate to students, set up conference calls to facilitate group conversations, engage in email exchanges or require students to submit work electronically that the instructor will evaluate."

Some schools have suspended instruction but continue to engage their students electronically during an anticipated two- or three-week break. (Who knows how long this will last?) These schools are simply issuing homework assignments or projects for the students to be working on. The students will submit their homework via email or other file-sharing procedure. Some schools say that have opened online discussion boards or chat rooms so that students can talk among themselves and with instructors as well about the assigned work. They have also made available to students Internet libraries that feature resource material in a field that is appropriate for the program. But in this second type of involvement (which may be called "web-enhanced learning") there is no regular and substantive instruction going on between student and instructor since (a) no new concepts, skills or competencies are being introduced by the instructor, and (b) the focus of the homework and projects is on skills and knowledge previously provided in the classroom before the temporary school closure took place. This type of digital involvement by the students is not considered by the Council as "distance education" because it does not meet the requirements stated above.

If you are in doubt of what your school may be doing, please refer to the definition in the first section above. If this is what your instructors are doing, please submit a Temporary Distance Education application. There is no application fee, the application itself is very simple and brief, and the turn-around time is very quick. If your instructors are simply engaged in "web-enhanced learning" you do not need approval from the Council to engage in these activities.

2. How do you request emergency or temporary approval from COE for distance education?

Send an email to alex.wittig@council.org and request an application. Our application approval time has been quite short—sometimes as quick as a day or two.

3. How long is the temporary approval in effect? If we are not allowed to return to school on April 15, will the approval automatically extend?

*The temporary approval is in effect for as long as the Department of Education allows. Originally, according to the March 5, 2020 memorandum from Federal Student Aid, the temporary approval was valid only for those students who were enrolled in the program in question on March 5, 2020; the memo specifically stated that the temporary online option was not intended for students who enrolled after March 5. However, on Friday, March 20, the Department revised this restriction. The temporary approval for distance education is **now** valid for students who are enrolled or will be enrolled in effected programs during payment periods that start “on or before June 1, 2020.” It is important to note that the temporary distance education approval letter from COE does not have a specific expiration date. Over the next few weeks, should the Department consider further revisions to their original memorandum the Council will comply with the Department’s latest considerations. Please bear in mind, however, that the Department’s original memorandum does state that these allowances (that is, special accreditation approvals for temporary distance education) are designed to cover the period when schools may be closed due to concerns about the spread of COVID-19. If a school is interested in permanent distance education options for its programs, it may use the Council’s standard distance education approval process.*

4. If COE approves a clock hour school to offer distance education, does that mean we are automatically in compliance with the USDOE?

The Council on Occupational Education has its 10 accreditation Standards as well as its criteria for eligibility for accreditation. Our only requirements addressing student financial aid are that (1) financial aid programs are capably administered and accurately documented; and (2) compliance with Higher Education Reauthorization Act Title IV eligibility and certification requirements is maintained. Beyond that, compliance to specific federal aid requirements is between the institution and the Department of Education. The Department has its own requirements for a program’s and a student’s eligibility for federal aid. A school can be in complete compliance with a COE requirement, but out-of-compliance with the Department’s Title IV regulations. As you may know, the Council does not have any accreditation criteria related to class attendance

or to verifying class attendance. The issue of verifying class attendance in online clock-hour programs for the purpose of federal financial aid is an important one for the Department of Education, but it is one that is outside of the Council's accreditation requirements and, therefore, outside of our review and approval. However, in an addendum to the Department's March 20 revision of its March 5 "Guidance for interruptions of study related to Coronavirus (COVID-19)" memorandum appears the following FAQ:

We have a clock hour program that we are considering moving to an online format in response to the COVID-19 outbreak. Is there any guidance you can provide us?

An institution that offers a clock hour program in a distance education format must ensure that each clock hour of instruction is supervised by qualified institutional personnel. In most cases, synchronous instruction through distance education, where students are actively engaged with an instructor in real-time discussion, would provide an adequate platform for the instructor to supervise students in clock hour programs.

However, an institution that offers asynchronous instruction in a clock-hour program must maintain an online learning platform or another system for monitoring each student's academic engagement to ensure that students are academically engaged in at least 50 minutes for each hour that is recorded as a clock hour attended by the student. In this circumstance, an instructor can complete a student's timesheet to include clock hours earned in a distance education format, but the hours must be based on data or the instructor's own knowledge that the student was academically engaged for at least 50 minutes out of each clock hour that is recorded.

Institutions must ensure that any clock hour offered through distance education meets all applicable requirements set by accrediting agencies and States and fulfills applicable educational prerequisites for State licensure.

5. Once we have it, is it considered a substantive change?

Yes, the temporary approval of institutional distance education is a substantive change. However, during this time of emergency action, the Council will allow the approval of this change even if (1) the institution has an accreditation visit scheduled within the next 6 months; (2) the institution has a prior substantive change application pending final approval with the Council; (3) the institution is in financial arrears with the Council; (4) the institution is on an adverse status with the Council; or (5) the institution is waiting for reaffirmation of accreditation by the Commission following an accreditation visit. In other words, a school will not be denied the approval of this substantive change due to the five items listed above.

6. What happens if an institution's reaffirmation visit is postponed this year?

Our goal is to keep as many visits on the 2020 calendar as possible. If a 2020 visit is not practical/possible we will make every effort to work with the institution to reschedule a visit in the first half of the 2021 calendar year, if possible. As a point of information, we also would expect that the hosting institution would write its self-study and prepare its exhibits according to the same 2019 criteria it would have used had the school hosted a visit in 2020.

7. For schools with reaffirmation visits that have been or might be postponed, what will happen?

Again, the hope is to reschedule postponed 2020 visits to later months on the 2020 calendar. Of course, the probability of re-scheduling in the same year becomes less likely if visits are cancelled near the end of the year or if there is a large volume of schools that require re-scheduling. In such cases, these schools' visits will be moved to 2021. (Please refer to Response #7 regarding visits that are postponed to 2021).

8. How do we prove to the USDOE that we are still in good standing with COE if our visit is postponed?

COE has a standard correspondence we provide to institutions that they share with oversight agencies to verify or confirm the school's accredited status. This letter will be revised to reflect the inclusion of a statement that basically explains that an institution whose accreditation visit has been postponed due to COVID-19-related matters continues to remain in good standing with the Council. COE staff will gladly provide this correspondence at the institution's request.

9. How do we handle spring advisory committee meetings if schools are closed for several weeks or months? (Most of us hold a fall meeting and then a spring meeting). I understand we will be able to hold one meeting virtually. Is that accurate? What do we need to prove we held the virtual meeting aside from our meeting minutes and agendas?

The following language is the Council's recent response to questions pertaining to occupational advisory committees. As I understand it, this information will also soon be made available on the website. I strongly recommend all institutions download and save this documentation as part of their accreditation files: The Council's criteria do not require more than 2 members present (of a minimum 3-member committee) for every scheduled advisory committee meeting. Schools should use this rule, if possible, to conduct committee meetings. However, because of valid concerns regarding 'social distancing' (mentioned in CDC guidelines), the Council is allowing one of the two annual advisory committee meetings to be held by teleconference or other virtual platform.

10. Our state has indicated we won't have to conduct faculty assessments for the 2019-2020 school year. Will COE still require them for Standard 8?

Staff is presently reviewing and re-evaluating this criterion requirement, among others. We plan to soon provide guidance on your question and several other such matters in the relatively near future.