

**Questions Asked During the WCET Webcast:
“Growing Federal Concern with Distance Education:
Could the Rules Be Changing?”**

Equity with Face-to-Face Instruction

Ame Mead- Fontbonne University: Though it may be frustrating, could someone address how the politicians are responding when we say "face-to-face students do the same things"?

Russ Poulin, WCET: I imagine that most politicians are not up-to-speed on some of the high-tech ways that students are using to cheat on tests in the classroom. Stories about the use of mobile phones during tests, finding pay-for-play thesis services online, and software that let you place miniature notes on the labels of water bottles are probably unfamiliar to them. But remember the role that the politicians are asked to play. They are charged with providing federal financial aid dollars and overseeing their expenditure. I'll pause while you snicker, but many of the Senators and Congressmen actually take this responsibility seriously. They are concerned with how billions of financial aid dollars are spent. Stories about colleges not being able to detect financial aid fraud in online classes, cheating in online classes, and recruiting stories from the recent for-profit institution Senate hearings do not help.

Should we give up? No. The job is just more difficult.

WCET Executive Director Ellen Wagner keeps using the term “eQuality.” This term creates two key foci for all of us: 1) Equality – we’re just asking for the right to be treated like traditional education; and 2) Quality – with that right comes the responsibility that we assure that our quality is as high as we can make it. These two foci inform us on what paths of action we should take. Let’s start with Quality. It’s up to each of us to shore-up the quality of our academic offerings, whether they be at a distance, hybrid, or face-to-face. For Equality, we need to continue to highlight when proposed regulations should be the same regardless of the delivery mode and that the regulation makes sense. My concern is that some of the new regulations could punish the innocent more than the guilty.

Last Day of Attendance

Rhonda Epper, *Colorado Community College System*: For Ken, any advice for how we should determine LDA -- what is a conservative approach anticipating greater oversight?

Ken Salomon, Dow Lohnes: Great question, Rhonda. Unfortunately, we cannot advise on what the conservative approach is or recommend any one way to calculate LDA because the Department has provided insufficient public guidance on this issue, which is confirmed by the statements of the IG and in ED internal emails obtained via FOIA and quoted during the webinar. Furthermore, since the webinar, the Assistant Secretary of Education for Postsecondary Education sent a letter to WCET and the three other the organizations that had asked ED for clarification on LDA in June. In the letter, ED noted that guidance has only been provided to “individual institutions” and not publicly to the entire community, more specifically:

“In general, the Department does not believe that documentation that a student has logged into all online class is sufficient by itself to demonstrate academic attendance. This position is consistent with the guidance the Department has provided to individual institutions regarding the applicability of the regulations to online programs.”

Therefore, this is a great opportunity to make your impact by contacting your Member of Congress and your associations in DC requesting public clarification on calculation of LDA. Please contact me at ksalomon@dowlohnegov.com if you would like assistance or a draft letter to be sent to your member.

Texas State University-San Marcos, *Have any models been put out there for verifying students on financial aid and their progress in online courses?*

Russ Poulin, WCET. Let me do the opposite. Let me point you to “what not to do” as that may be more helpful. Read [WCET’s recent blog entry](#) on the “last day of attendance” issue and read the [audit statement](#) for Baker College. This will give you a good idea of what the U.S. Department of Education is expecting in terms of both the first and last day off attendance for financial aid reimbursement purposes.

Academic Integrity

There were several related questions on the issue of 'academic integrity' and assuring that the student completing any assessment is the one who is registered for the course:

- 1) **Sal Sanders** - YSU: *What are some strategies we can use to verify our students and to ensure they are the one's doing the work and actually fulfilling course requirements?*
- 2) **UMass_CPE**: *RE: Verification ... what is anyone doing beyond login authentication?*
- 3) **Marina Bluvshstein - Adler Graduate School**: *Can having a residential (F2F) component, along with using a video-assisted enrollment interview be helpful in ensuring students are who they say they are?*
- 4) **Tom Benberg**: *What is the best way to ensure that the student registered for the course is actually the one taking the test?*

Mollie McGill, WCET: There were a number of questions about academic integrity and student identity verification in online education. It is important to separate the issues of assuming someone else's identity for purposes of cheating in an online discussion or taking a high-stakes online exam, from a more criminal activity of identity misrepresentation for financial fraud.

The Higher Education Opportunity Act (HEOA) of 2008 and the resulting U.S. Department of Education requirements address the concern of assuring that the student who enrolls in an online course is the same person doing the work and earning the grade. It does not address the identity verification of students during processes of admissions and financial aid applications.

The new law is aimed at the accrediting agencies that must ensure distance education programs use one of three methods to verify the identity of distance education students:

- secure logins and pass codes,
- proctored testing, or
- authentication technologies.

In spring 2010, the [Higher Learning Commission](#) (HLC) of the North Central Association added questions regarding identity verification practices and policies to its annual data report from

institutions, and a representative of HLC will report on findings at [WCET's Annual Conference](#) in La Jolla, California.

From a March 2010 webcast featuring Lori McNabb, former chair of WCET's Academic Integrity and Student Authentication Study Group, summarized a few points that institutions ought to consider:

- Do you implement authentication or proctoring or both?
- When does the first authentication occur and how often thereafter?
- For what types of assessments is authentication required?
- What's the impact on students, on faculty, and who monitors the data?
- Is the solution only for online students?

In addition, McNabb recommends that institutions work with their regional accrediting agency to understand and meet their requirements, create an institution-wide culture of integrity that clearly articulates faculty and student responsibilities, and take inventory of current institutional practices and policies related to cheating and misrepresentation on a campus-wide basis ensuring that campus IT/networking and distance ed/e-learning units (if separate organizational units) address this issue together. For tips on approaches to academic integrity in online education, download a copy of WCET's ["Best Practice Strategies to Promote Academic Integrity in Online Education,"](#) produced in partnership with ITC and the UT TeleCampus. The New England Association of Schools and Colleges (NEASC) has revised ["Guidelines for the Evaluation of Distance Education \(Online Learning\),"](#) which includes a recommendation to its member institutions to consult the WCET Best Practices resource.

Student ID Verification Technologies

There were a couple questions regarding the technologies that are now emerging to assist in the verification of student identities:

- 1) **Michal Moskow:** *I find the verification that Acxiom uses (used by Moodlerooms) frightening in that this is one more site that collects a wealth of information about individuals, including home and family. Is there work going on that would not intrude into private individual information that a person might legitimately not want on the web?*

2) **Dan_Barnett:** *The proposed biometric solutions to online integrity seem Orwellian; and they can be defeated. Even challenge questions can be defeated if the "real" student is sitting next to the person hired to take the class. The system depends on trust, and we can put up a few speed bumps, but the reality seems to be there is no way to stop potential fraud. Isn't that a fact of life? An unknown x% of students are gaming the system. Would the problem be better addressed, somehow, after the fact, if there was suspicion that a student didn't really "learn"? Come to think of it, I'd rather not have my doctor come under such suspicion during an operation! So what can we do? Are we stuck*

Participants in the webcast provided several good responses to these questions:

- **Rhonda Epper**, Colorado CC System: Mr. Moskow -- this is the same data used by financial services industry. CCCS is using Acxiom starting this fall for all CCCOnline students.
- **Columbia Basin College:** @Michal Axiom uses information collected from existing databases and challenges the student with it
- **Ame Mead- Fontbonne University:** Regarding biometric and Axiom- Students who are trying to cheat will provided that needed information to get around these "protections." That is what frustrates me about these products/issues.
- **UMass_CPE:** Video tools (like this one) ensure consistence throughout a course once identity is established.

Mollie McGill, WCET: Technology solutions for identity verification in higher education is a relatively new industry and it is likely to be a growing industry. WCET has work underway as part of its EduTools 2.0 development to obtain detailed information about products currently being marketed to higher education, including the following:

- Monitoring solutions: Digital Proctor, Kryterion, ProctorU, Software Secure.
- Biometrics solutions: Biometric Signature ID, iMagic Software, CSIdentity.
- Challenge questions: Acxiom Identity Solutions.

Some of these solutions are implemented and in use by a modest number of colleges and universities, however, it is our sense that this whole arena of technology solutions for identity verification is still evolving, with the outcome of pilot projects still an open question. Meanwhile,

we again recommend WCET's ["Best Practice Strategies to Promote Academic Integrity in Online Education,"](#) produced in partnership with ITC and the UT TeleCampus.

International Students

University of Northern Colorado: *Can we expect greater scrutiny for those who cater to the international student - crossing international borders, that is?*

Ken Salomon, Dow Lohnes: If you are referring to international students residing in their home countries and taking courses from a US online program, we do not think institutions catering to such international students should expect greater scrutiny, at least to the extent that these students do not receive Title IV funding . However, our feeling is that all aspects of distance learning serving Title IV students should anticipate greater scrutiny across the board.

What to Do Next?

Muriel Oaks-Washington State University: *Following up on Ken's suggestion about bringing our presidents up to date, it might be helpful for WCET to provide some talking points.*

Ken Salomon, Dow Lohnes: Dow Lohnes Government Strategies will work with WCET to develop talking points to be circulated around campus. The focus is to encourage presidents and provosts who share your concern to energize the major national higher education organizations to recognize the threat and make combating it a top priority.

Russ Poulin, WCET: I made a start at developing some talking points. As Ken suggests, we will continue to work with Dow Lohnes Government Strategies on this:

- Congressional action – Usually major changes to higher education and financial aid regulations are part of the higher education authorization acts. Congressional concern over higher education does not end with the actions uncovered in the recent hearings about for-profit colleges. The recession is bringing an end to the ever-growing financial aid pool that institutions have helped institutions implement tuition increases at rates higher than

inflation. Meanwhile, the accrediting agencies are being viewed as an ineffective oversight mechanism.

- Accrediting agencies – The value of accrediting agencies is being [called into question](#). The Higher Learning Commission was cited for how it treated one institution regarding its definition of the credit hour. Expect requests for more information about quality to be made of the accrediting agencies. They will turn to colleges for the information. Chairman Harkin of the Senate Health, Education, Labor, and Pensions Committee is expected to hold a hearing in September on accreditation, at least the system for accrediting for profit schools. But it is hard to see the inquiry stopping at just one sector once the door is kicked open.
- Punish the innocent? Higher education needs to be concerned that the Congressional “fixes” will punish the innocent along with the guilty. It is time to pay attention to what will be proposed. For example, the language in the 2008 Higher Education Opportunity Act regarding academic integrity followed the removal of the 50% rule in the 2006 Higher Education Reconciliation Act. The rule denied students federal financial aid if their institution offered more than 50% of its courses via distance education technologies and/or correspondence. The 50% rule was moved to other legislation and the academic integrity language remained.
- What might be proposed? There are several ideas that have been floated:
 - Define the credit hour. Financial aid is distributed based upon credit hours attempted, but distance education calls into question the “seat time” definition used for it.
 - Recruiting students. Will there be more regulations on what college recruiters can say and promise to perspective students?
 - First and [last day](#) that a student attends a course. Recent U.S. Department of Education audits of institutions and the recent Senate hearings have called into question institutions’ ability to document when a distance student starts a class and the last day that the student engaged in an academic activity if that student drops out without notice.

- Employability. Are students getting jobs? Should aid be restricted or ended for academic programs in which students are not employed within a given timeframe after graduation? Should this apply primarily to for profit schools or to all higher education institutions?
- Financial aid load. Will the amount of loans a student can accumulate be limited based upon their field of study and the likelihood that the student will be able to repay that loan once the student graduates?
- Diploma mill. [A House bill, H.R. 4535](#), is the only one of these issues in current legislation. It would give the federal government more firepower in battling diploma mills. The bill has not moved forward in several months.

Bob Jones - EPCC 1: Very interested in promoting advocacy to develop proactive approaches particularly with accreditation. Please let me know how I can help and participate

Ken Salomon, Dow Lohnes: Ken Salomon: This may be a good time to reach out to the Council for Higher Education Accreditation (“CHEA”) and let your voice be heard on the importance of distance learning within the accreditation community.

Russ Poulin, WCET: Bob, thank you for your offer of help. El Paso Community College is a [WCET member](#). Watch for more information from us on how you might participate. We will watch the legislation as it emerges and suggest actions that members might take in response to those proposals.