

Institutional approval to go online Accreditors & Department of Education March 5 guidance

3/20/20

Issue

When an institution converts the modality of its courses from face to face to online delivery, there may be a required approval process from the Department of Education and the institution's regional accreditor.

Impacted

Institutions that have not already received approval to offer distance education may be impacted. Institutional staff directly impacted may include directors of distance education, academic leaders with program authority, institutional compliance officers, and those tasked with working with accreditors.

Effective Dates

The March 5 Department of Education (USED) guidance originally applied to the term in which the student is currently enrolled. However, a USED March 20 guidance update extended flexibility to include when students enroll in payment periods that begin on or before June 1, 2020. The institutional accreditors have developed processes and COVID -19 responses that correspond to the Federal guidance.

Background

Typically, when an institution develops online programs, the institution must meet certain quality standards and obtain approval from the institution's accreditor and the USED. There is a process to obtain a substantive change approval from the institutional accreditor. Federal regulations tie certain quality standards subject to the compliance oversight of the institutional accreditors in order for the institution to participate in Title IV HEA programs. The USED guidance from March 5, 2020 provides broad approval for institutions to convert face to face courses to online courses to accommodate the students whose enrollment has been interrupted due to COVID-19 by permitting accreditors to waive online education review requirements. To meet the Department's requirements for providing online education, an institution must communicate to students through one of several types of technology as described under 34 CFR §600.2, and instructors must initiate substantive communication with students, either individually or collectively, on a regular basis.

Although the USED guidance provides flexibility for accreditor approval, accreditors may still have requirements that are outside of Federal authority and must be observed by the institution. Institutional accreditors vary as to their responses and required processes to obtain approval for this conversion of face to face courses to online. Various regional accreditors' processes could include submission of a waiver, communication with the institutional accreditor, or no action. It is important to review the requirements of the institution's accreditor. Note that institutional accreditors continue to update their guidance.

Recommended Action(s)

- **Identify courses** – List courses that have been converted to online format due to COVID-19.
- **Review & comply with any requirements-** Assess steps and comply with regional accreditor requirements, if any.
- **Document** – Make a record of all changes to maintain educational continuity.

Applicable regulations

- [34 CFR 600.2](#)
- [Guidance for interruptions of study related to Coronavirus \(COVID-19\)](#);USED 3/5/20 updated 3/20/20

Resources

- [Accreditation, Continuity of Operations, and COVID-19](#), WCET Frontiers
- [COVID-19 Institutional Accreditor Guidance Weblinks](#) - list of each institutional accreditor webpages
- [C-RAC Members COVID-19 Response Page](#)



This work is licensed under a [Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International License](#).
The content of this policy review should not be considered to be or used as legal advice. Legal questions should be directed to legal counsel.