COVID-19 and Proctoring Costs

March 25, 2020

Issue
Federal regulations require institutions to disclose proctoring fees at the time of a student’s registration in a distance education course. In response to COVID-19, USED has allowed accreditors flexibility in enforcing this requirement. Although institutions may have flexibility in disclosing proctoring fees to students, WCET recommends that at the very least institutions disclose proctoring fees as quickly and clearly as possible. Furthermore, WCET recommends that institutions seriously consider waiving proctoring fees for affected students as many students are being impacted by the current economic downturn.

Impacted
This issue impacts an institution’s administrators in charge of accreditation, regulatory compliance, financial aid, and academic affairs.

Effective Dates
According to USED, this flexibility applies “to students who enroll in payment periods that begin on or before June 1, 2020.” USED has not extended this flexibility beyond this date.

Background
34 CFR 602.17(q)(2) requires institutions to disclose proctoring fees at the time of a student’s registration in a distance education course. (This regulation will be found as 34 CFR 602.17 (h) starting July 1, 2020.) For the purpose of Title IV compliance, this is a regulation that the accreditors enforce. According to the March 5 memo, accreditors have discretion to waive this requirement: "We [USED] are also permitting accreditors to waive their distance education review requirements for institutions working to accommodate students whose enrollment is otherwise interrupted as a result of COVID-19."

Despite this flexibility, to serve students that COVID-19 is disrupting, WCET recommends disclosing any additional proctoring costs to students as soon as possible. Better yet, institutions should refrain from charging for these services.

Recommended Action(s)

- Do not charge for proctoring fees resulting from COVID-19: Put students first.
- If your institution chooses to charge, disclose the fees: Do so ASAP.
- Keep a written record: "We [USED] recommend that institutions document, as contemporaneously as possible, any actions taken as a result of COVID-19."
Applicable regulations and policies
The USED Memo of March 5; 34 CFR 602.17(g)(2). (Moving to 34 CFR 602.17 (h) starting July 1, 2020.)