



Policy: Distance Education Policy

Responsible Office	Academic Affairs		
Effective	November 4, 2025		
Revised			
Last Reviewed	February 3, 2026		
Compliance	NWCCU Policy on Distance Education; U.S. Department of Education (USDE) regulations [34 CFR 600.02, 34 CFR 602.17]		
Classification	<input checked="" type="checkbox"/> Institutional	<input type="checkbox"/> Board of Directors	<input type="checkbox"/> Local unit(s):
Approving Body	<input checked="" type="checkbox"/> President’s Counsel	<input type="checkbox"/> Board of Directors	<input type="checkbox"/> Unit VP

Policy

Heritage University is committed to ensuring the academic integrity of its distance education programs and courses. In compliance with U.S. Department of Education regulations and Northwest Commission on Colleges and Universities (NWCCU) standards, the University has implemented effective procedures to:

1. Verify that the student who registers for a distance education course or program is the same student who participates, completes the course or program, and receives academic credit.
2. Ensure and document that all distance education courses provide regular and substantive interaction between instructors and students.
3. Protect student privacy in all verification and interaction processes.
4. Provide clear and timely notification to students of any additional charges associated with student identity verification.

This policy applies to all courses, both synchronous and asynchronous, offered via distance education at Heritage University. The Center for Intercultural Learning and Teaching (CILT) will monitor the policy.

Core Requirements and Examples

To ensure compliance, all distance education courses must meet the following requirements:

1. Student Identity Verification

- **Requirement:** The University must use one or more effective methods to verify student identity.
- **Examples of Verification Methods:** At least one of the following (or a combination) must be used:
 - A secure login and password to the University’s Learning Management System (LMS), such as Canvas.
 - Proctored examinations (either in-person at an approved testing center or through an approved online proctoring service).
 - Video-based assignments, presentations, or one-on-one conferences where the student is visible.
 - Multi-factor authentication (MFA) for accessing the LMS or course materials.
 - Use of identity verification services that require students to present government-issued photo ID.
 - Assignments that require students to reflect on or use personal information that is not

publicly available but is known to the institution via the student's admission or registration records.

2. Regular and Substantive Interaction

- **Requirement:** All distance education courses must be designed to include both *regular* (predictable and scheduled) and *substantive* (engaging and instructional) interaction between the instructor and students. Instructors must initiate this interaction.
- **Examples of Regular Interaction (Predictable & Scheduled):**
 - Providing weekly announcements that guide students through course content.
 - Establishing and posting predictable virtual office hours.
 - Providing a clear schedule for feedback on assignments (e.g., "All major assignments will be graded with feedback within 7-14 calendar days of the due date.").
 - Holding required weekly synchronous sessions (e.g., via Zoom).
- **Examples of Substantive Interaction (Instructional & Engaging):**
 - **(Direct Instruction):** Providing instructor-created video lectures, interactive tutorials, or synchronous class sessions.
 - **(Feedback):** Providing individualized, detailed, and non-generic feedback on a student's coursework, such as an essay, project, or exam.
 - **(Facilitating Discussion):** An instructor posting guiding questions in a weekly discussion board *and* actively participating by summarizing, correcting misconceptions, or asking follow-up questions. (Note: Student-to-student discussion alone is not sufficient).
 - **(Responding to Questions):** Answering student questions about course content in a public course Q&A forum or in a group email (as opposed to questions about logistics).

3. Student Privacy

- **Requirement:** All verification methods and course interactions must protect student privacy in accordance with the Family Educational Rights and Privacy Act (FERPA).
- **Policy:** Student data collected for identity verification will be protected and used solely for that purpose. Any third-party vendors used for verification (e.g., online proctoring) must be vetted for FERPA and data security compliance.

Definitions

- **Distance Education:** Education that uses one or more technologies (such as the Internet, one-way and two-way transmissions, or audio conferencing) to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously.
- **Regular Interaction:** Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course. This includes monitoring the student's academic engagement and success and being responsible for promptly and proactively engaging in substantive interaction with the student when needed.
- **Substantive Interaction:** Engaging students in teaching, learning, and assessment. This includes at least two of the following:
 1. Providing direct instruction.
 2. Assessing or providing feedback on a student's coursework.
 3. Providing information or responding to questions about the content of a course.
 4. Facilitating a group discussion regarding the content of the course.
 5. Other instructional activities approved by the institution.

Related Documents

Distance Education Guidelines

NWCCU Distance Education Policy

NWCCU Distance Education Policy Verification

USDE regulations [34 CFR 600.02, 34 CFR 602.17]