Distance Learning Policy Guidance

In June 2007, The U.S. Department of Education, Office of Vocational and Adult Education, received approval from the Office of Management and Budget to collect and report demographic, enrollment and outcome data on distance education learners. Local programs can offer distance learning and report the students in the National Reporting System (NRS).   This document provides guidance to help states develop written policies to guide local implementation of distance learning programs. States may follow the organization used in this document or they may use another format and organization, whichever best meets state needs. This document also contains two appendices that states might find useful: Appendix A includes sample distance education policies and Appendix B contains information about developing proxy contact hours for distance learning curricula. The five items below might be things to address in your state plan:

1. **Setting the State Context** includes an overview describing the need for and purposes of the policy in the state context.

2. **General Distance Learning Requirements** defines distance learners, identifies the methods to be used for assigning contact hours and proxy hours, defines curricula and materials that may be used at a distance, and specifies assessment requirements for distance learners.

3. **Application and Approval Procedures to Operate a Distance Learning Program** explains what local agencies will need to do in order to offer distance learning.

4. **Funding for Distance Learning Programs** describes how distance learning will be funded, whether through specialized grants or as part of the regular funding process.

5. **Training Requirements** describes what training is required or recommended for agencies and teachers offering distance learning.

Please note that these guidelines are intended to help states prepare a state plan but do not preclude states from taking other approaches that may better serve their needs.

1. Setting the State Context

The policy should include a section with a basic overview of the policy, including descriptions of any distance learning issues specific to the state. It should describe the need for the policy, the state's approach to distance learning and the need for data about distance learning within the state. Also describe here any unique conditions within the state that affect the policy.   Below are suggestions for topics to include to set the state context.

- Present the state's need for distance education. Discuss the role(s) that distance learning can play in the state in both increasing students served and providing options to keep current learners engaged.

- If the state has done any analyses or studies related to the effectiveness of distance learning, describe any findings or studies that affect state policy and procedures.

- Describe how distance learning will be offered in the state. This might include brief descriptions of who can provide distance learning, curricula that may be used at a distance and state reporting requirements.

- Provide contact information for local program staff that have questions or require clarification of the state policy.

2. General Distance Learning Requirements

The document should include the general policies that apply to all distance education students in these four areas:

A. How distance education programs and distance learners are defined

B. A list of curricula that may be used for distance education or an explanation of how local programs select curricula

C. How contact hours will be identified and reported

D. An assessment policy for distance students

States may add additional sections as needed to suit their needs.

A. Definition of Distance Education and Distance Learners

For the purpose of federal reporting of distance education students, the state policy must include the definition of distance education provided in the *National Reporting System Implementation Guidelines, July 2007*:

> Distance education is formal learning activity where students and instructors are separated by geography, time or both for the majority of the instructional period. Distance learning materials are delivered through a variety of media including, but not limited to, print, audio recording, videotape, broadcasts, computer software, web-based programs and other online technology. Teachers support distance learners through communication via mail, telephone, e-mail or online technologies and software.

Each state needs to define which students they will consider distance learners. It is not uncommon for adult learners to take both a distance learning course and a traditional classroom-based course during the same academic or fiscal year. Classifying a student as only a distance student or only a classroom student is easy if the student takes only one course during the year, or if the student takes only one type of course (e.g., all of the student's classes are either distance learning or they are all classroom). But the study patterns of adult learners suggest that adult learners are likely to move between distance and classroom-based programs, depending upon their needs and their life circumstances. All hours earned in both distance and classroom courses should be reported for all students, whether they are classified as distance or classroom learners. For participants who receive both distance education and traditional classroom instruction during the program year (such as through a blended distance-classroom approach or concurrent enrollment in both types of instruction), NRS guidelines require states to have a policy on how local programs are to classify the student for federal reporting. The guidelines require that the state count a student only once, as either a distance education student or traditional learner. States may have other data reporting requirements in addition to the NRS that they choose to address in their distance learning policy.

B. Curricula that May Be Used for distance learning

States should specify the curricula that may be used for distance learning and/or describe how local agencies may make choices about curricula. At the present time there are a limited number of curricula either designed specifically for, or easily adaptable to, distance learning. This is likely to change over time as more commercial curricula become available for distance learning. In addition, as teachers become more experienced and skilled at delivering distance learning, they are likely to draw from multiple sources to best support their students, as they do in the classroom. States should indicate how they will expand curricular offerings as deemed appropriate.

Moreover, some states may opt to allow local agencies to develop distance learning courses using existing course management systems (e.g., Blackboard). State policy should describe who is able to develop and teach these courses and provide information about how these courses will be approved by the state. This might include information about the training needed for teachers to develop and offer courses, how proxy contact hours will be determined and instructional strategies.

C. *Identifying and Reporting Contact Hours for Learners in Distance Education*

Measuring contact hours for distance learners is more complicated than measuring contact hours for classroom learners, where the learner is physically present. State policies should address the following:

- Distance learners must have at least twelve hours of contact with the program before they can be counted for federal reporting purposes. As indicated in the NRS guidelines, this can be "a combination of actual contact and contact through telephone, video, teleconference or online

communication, where student and program staff can interact and through which learner identify is verifiable." The policy should specify what can be included in the twelve hours reflecting NRS guidelines on counting actual contact hours.

- *Reporting of proxy contact hours* is *optional*. States need to indicate if they will or will not be reporting proxy contact hours in the NRS. States that choose to collect and report proxy contact hours must have a policy that describes the following, each of which will be discussed in more depth in Appendix B entitled "Guidelines on Proxy Contact Hours":

  - *A list of curricula that may be used for distance education or an explanation of how local programs make curricular choices*

  - *The model or models used to assign proxy hours or an explanation of how local programs make these determinations*

  - *The formula for calculating proxy contact hours for each curriculum*

  - *The procedure used by the state to develop proxy contact hours*

An easy way to indicate which curricula may be used in the state and the appropriate Proxy Contact Hour (PCH) model, if the state chooses to collect and report proxy hours, is to adapt Appendix B, deleting the rows with curricula not being used and adding rows for other curricula.

D. Assessment of Distance Learners

For distance learning to become an integrated part of adult education, it is important for distance learners to be assessed using appropriate standardized assessments. Note that the State Assessment Policy must cover distance education students. The information presented in the Distance Learning Policy should be developed in conjunction with the Assessment Policy and should cross-reference that policy. Distance students must follow all existing assessment policies for administration, scoring and interpretation of test results. The assessment policy for distance education students must include:

The test(s) that can be used to assess distance learners. States must use an assessment that meets the NRS guidelines for assessment of adult learners.

- *How, where and by whom tests may be administered.* Assessments must be conducted in a proctored setting with a trained test administrator in a secure setting to be acceptable for NRS reporting. The state may wish to incorporate procedures for in-person testing that accommodate large

geographic barriers between the student and testing site, such as cooperative testing arrangements with another local program.

The methods used to determine when to posttest distance students. The NRS Guidelines state that distance students "should be posttested after the same amount of instructional time as other students, according to the state's approved NRS assessment policy." States that choose to use an approved proxy hour model must use those hours to measure the time from pretest to posttest. States that choose not to report proxy contact hours must describe how they will monitor student instructional time to specify the basis they will use for determining when to assess distance learners.

3. Application and Approval Procedures to Operate a Distance Learning Program

States may structure their distance learning programs in many ways, ranging from making distance available at all qualified local agencies to offering it through a limited number of centralized or hub sites. States should specify the procedures local adult education providers must follow in order to offer distance learning in addition to traditional classroom-based programs and the procedures and criteria for selecting these programs.

4. Funding for Distance Learning

States should describe how they will fund local agencies to deliver distance education programs. This section needs to detail how funding will be provided to agencies for offering distance learning. It may include information about the total amount of funding available (if specialized distance education grants are offered) or the funding mechanism that will be used to generate support for distance education programs.

5. Training Requirements

Distance learning is sufficiently different from classroom teaching that it requires classroom teachers to develop new skills. In this section, states should specify the training required or recommended for teachers and programs in order to offer distance education programs. This might include a separate section about the types of training recommended for teachers developing courses on existing course management systems.

APPENDIX A
EXAMPLES OF STATE DISTANCE LEARNING POLICIES

Example 1:
Policy for a State Using Proxy Contact Hours

Setting the State Context

Background. Because of the rural character of our state, we have been actively seeking alternatives to traditional classroom programs to reach adults in need of educational services. We have been providing distance learning in three pilot programs for the past two years and have found that distance learning can be an effective way to serve learners who are unable to come to regularly scheduled classes at our provider agencies. It seems to be a particularly attractive option for students who live some distance from the nearest adult education agency and those with irregular work schedules that make regular class attendance difficult. In addition, two of our pilot programs have reported that they have moved several classroom learners who were ready to drop out of the program into distance learning, where they have continued their studies. Thus, we see distance learning as providing a useful option for both reaching new learners and better serving those who are already in our classes.

Data about Distance Learning. In order to understand the effectiveness of our pilot program, distance teachers kept detailed records of students' instructional time and educational gains. These data have been invaluable in helping us assess the program and plan for improvements. Data will continue to be a critical component of our distance learning program as we move beyond the pilot phase, particularly as entering students in the NRS will allow us to count the hours they generate.

Although data from our distance learning program must be viewed cautiously because of the small size of the pilot program, they do offer some intriguing insights into distance learning in our state. On average, students in the distance learning pilot program tend to have slightly higher entering Educational Functional Levels (EFLs) than do classroom students. Distance students stayed in the pilot programs an average of 12 weeks and accrued an average of 46 proxy contact hours. Posttest data were available for 62% of distance students; of those with posttests, 71% posted an educational gain of one or more EFL. These data indicate that distance learners in the state can persist at their studies and make educational gains.

Overview of Distance Learning in the State. Because it is necessary for students to go to a local education provider for intake, orientation and posttesting, we will continue to offer distance learning through local adult education providers. All adult education providers will be given the opportunity to participate in the training session that will

allow them to provide distance education this coming academic year. *Only agencies that have completed the training will be allowed to offer distance learning to their students.* Two curricula have been approved for use at a distance: *GED Connection* for Adult Basic Education (ABE) and GED students and *English for All* for English as a Second Language (ESL) students. Teachers will maintain records of proxy contact hours for both state and NRS reporting requirements following the formulas in the Appendix.

Contact Information. If you have any questions about the state distance learning policy or any of the requirements for reporting data about distance learners, contact Elizabeth Bennett (ebennett@pemberly.edu or 734-555-3456).

General Distance Learning Requirements

Defining Distance Learners. A student is classified as a distance learner if the majority of contact hours earned in a program year is derived from proxy contact hours. Classroom hours and proxy contact hours will be recorded in separate fields in the state data system. The decision about the student's status as a classroom or distance learner will be made at the end of the year based on where 51% or more of the student's hours were earned. The student's hours in both distance and classroom programs will be included in the NRS report.

Curricula that May Be Used for Distance Learning. Only the following curricula may be used for distance learning: *GED Connection* and *English for All.*

Measuring Contact Hours. The following activities may be included in the twelve hours of contact with the agency required for all distance students: all face-to-face sessions dealing with intake, assessment and orientation, telephone calls designed to counsel students into the appropriate programs, completion of a local agency's online registration and intake forms, completion of self-assessments of readiness for distance learning, technology training needed to use the distance learning curriculum, training in using the curriculum and training in study and time management skills (whether delivered in person or at a distance).

The manner in which proxy hours will be determined will vary depending upon the curricula used. For *GED Connection,* the teacher verification model will be used. The mastery model will be used with *English for All*. We will use the proxy contact hour equivalents for *GED Connection* and *English for All* developed by Project IDEAL, following the formulas in the Appendix.

Assessing Distance Learners. Distance learners must be assessed under the same guidelines as all adult learners in the state. For distance learners enrolled in a blended course, assessment will be scheduled as part of the classroom hours for the course. This activity will be scheduled so that it corresponds to the appropriate numbers of hours of instruction for posttesting as indicated in the state's assessment policy. All assessment must occur in secure, proctored settings, but it permissible to arrange for remote testing locations that are more convenient for distance learners as long as all state requirements concerning assessment are met.

Application and Approval Procedures to Operate a Distance Learning Program

Any agency in the state may offer distance learning as an option for their learners provided that:

- Staff participated in the state's original distance learning pilot program, or

- An administrator and at least two teachers from the agency participate in the distance learning training offered by the state.

Agencies may not begin offering distance learning until they have met this requirement.

Funding for Distance Learning

Since we have finished our pilot phase, agencies will be funded for distance learning in the same way they are funded for all other services they provide. No special or additional funds will be available for distance learning. However, agencies may apply for stipends to cover the cost of travel to the required distance learning training sessions.

Training Requirements

As indicated above, all programs interested in providing distance education must complete the required state training program. We will use the DL101 course from Project IDEAL, which includes a one-day face-to-face training followed by a 5 week online course. Experienced distance teachers are strongly encouraged to participate in one of more of the online study groups offered by the state that explore in more depth issues related to distance teaching, persistence and evaluating online resources for distance students.

Example 2:
Policy for a State Not Using Proxy Hours

Setting the State Context

Background. After pilot testing distance learning for several years, we felt that this option should be available to all students in the state. However, not all agencies were interested in providing these services. We therefore have moved to a "hub" delivery system consisting of eight distance education providers throughout the state. Each of these provider agencies has a partnership with two or more agencies not offering distance learning. The local (or referring agency) conducts the intake, orientation and all assessment of the student. The hub agency provides the distance instruction. The hub agencies receive additional state monies to serve these additional students, while the referring agency is able to count the student in their total of students served. This approach has worked successfully for the past eighteen months, serving students who might not otherwise take classes.

Data about Distance Learning. We have data available on the first year and a half of working with the hub model. We have increased the total number of students served through this approach and the percent of distance learners earning their GED is similar to the percent of classroom students. On average, students stayed in the program 17 weeks. Posttest data were available for 89% of distance learners and 82% posted an EFL gain of one or more levels.

Overview of Distance Learning in the State. As discussed earlier, we will continue to use the hub model to deliver distance education to adult learners. We are currently working with ABE/GED students, but are exploring the possibility of offering ESL at a distance in the coming year. Two curricula have been approved for use at a distance: *McGraw Hill Contemporary GED Online* and *SkillsTutor*. We will not track proxy contact hours for distance students.

Contact Information. If you have any questions about the state distance learning policy or any of the requirements for reporting data about distance learners, contact Jane Bennett (jbennett@netherton.edu or 734-555-1234).

General Distance Learning Requirements

Defining Distance Learners. A student is classified as a distance learner if the *first* class in which he or she enrolls in a given year is a distance class and a classroom learner if the first class he or she takes is a classroom course. This assignment is made upon initial registration. The student's hours in both distance and classroom programs should be included in the total number of contact hours reported.

Curricula that May Be Used for Distance Learning. Only the following curricula may be used for distance learning: *McGraw Hill Contemporary GED Online* and *SkillsTutor*. If the state approves offering ESL at a distance, curricula will be identified.

Assessing Distance Learners. Distance learners must be assessed under the same guidelines as all adult learners in the state. Students will be posttested at the end of the semester or term or upon completion of defined curricula.

Application and Approval Procedures to Operate a Distance Learning Program

Only agencies designated as "distance learning hubs" may provide distance learning. There no plans at the present time to add additional distance learning hubs, but we will revisit that next year. All adult education providers may refer learners to a distance hub.

Funding for Distance Learning

As noted above, the referring agency is able to count the student in their totals of students served and the hub agencies receive additional state monies to serve these additional students. This approach means that both the hub and referring agencies benefit from the arrangement.

Training Requirements

The distance learning hubs have gone through extensive training. More professional development on distance teaching and building communications with referring agencies is planned. Referring agencies must complete a training session that will orient them to the needs of distance students, discuss intake and orientation approaches and maintaining communication with the hub agencies.

APPENDIX B:
SUGGESTED GUIDELINES ON PROXY CONTACT HOURS

Suggested Guidelines on Proxy Contact Hours

Model or models used to assign proxy hours. The NRS guidelines state that proxy contact hours must be developed using one of three specified models: clock time, teacher verification or learner mastery. States need to specify the model or models that will be used to assign proxy contact hours for each curriculum approved for distance learning. As the models are appropriate for different types of curricula, states using multiple curricula are likely to use more than one proxy contact hour model. (see *NRS Guidelines for Distance Education* for further details.)

- The clock time model may only be used with curricula that track the time the student interacts with the curricula and which also contain a mechanism to log students out of the program after a specified period of inactivity. One hour of clock time will be reported as one proxy contact hour. States should indicate which of their distance learning curriculafit this model.

- Both the teacher verification model and the learner mastery model are appropriate for use with curricula that do not track time. It is possible to use either of these models with the same curriculum. For example, some states have opted to use a mastery model to assign proxy contact hours for Crossroads Café, with students being given a certain number of proxy contact hours for demonstrating mastery of the material on a chapter quiz or test. However, it would be equally acceptable to use the teacher verification model with this curriculum: students could be assigned a predetermined number of proxy contact hours for completing each instructional component (e.g., viewing a videotape, completing the workbook activities for the unit). States should note which model will be used for each approved curriculum and specify the formula for calculating proxy contact hours.

- The mastery model may also be used with any curriculum. States may choose to require students to pass mastery tests (either those built into the curricula or ones designed by the state) to receive proxy contact hours.

The table below shows the proxy contact hour models and the formulas for determining proxy contact hours for several curricula used by states participating in the Project IDEAL consortium (projectideal.org). It shows approaches to assigning proxy contact hours that have been established by Project IDEAL. States are free to use different approaches.

The proxy contact hours assigned for each curriculum. States opting to use proxy contact hours should specify how the proxy contact hours are assigned for curricula using the learner mastery or teacher verification models. They should also describe how those proxy hours were determined (e.g., used the proxy contact hours established by Project IDEAL, worked with a panel of experts and teachers in the state to determine the appropriate proxy contact hour assignments, etc.).

- When using the learner mastery model, states should indicate the number of proxy hours awarded for demonstrated mastery of a specified segment of content (e.g., a unit or chapter of instructional content). For example, a state may award six hours of proxy time for every unit test in *English for All* that a student passes at a predetermined level (e.g., at least 70% or 80% correct).

- When using the teacher verification model, states should specify the number of proxy contact hours assigned for completing each type of assigned activity. For example, states using a multimedia curriculum such as *Workplace Essential Skills* would need to specify the number of proxy hours to be assigned for viewing the videotape, completing workbook activities, completing Internet activities and taking the online tests.

- States should indicate the curricula for which they will use the clock time model.

Example of Policies for Determining Proxy Contact Hours Using
the Clock Time, Teacher Verification and Mastery Models

Example 1: *Clock Time Model. SkillsTutor* tracks the time that students work in the curricula and logs students off after a specified period of inactivity. Each hour of clock time will be counted as one proxy contact hour. For example, a student who logged 8.5 hours on *SkillsTutor* would be awarded 8.5 hours of proxy contact hours.

Example 2: *Mastery Model.* Students studying *Crossroads Café* at a distance are required to take mastery tests at the completion of each instructional unit. Ten proxy contact hours are awarded for each test the student passes with a score of 70% of better. This corresponds to the assigned number of proxy hours established by North Carolina and used in other Project IDEAL states.

Example 3: *Teacher Verification Model.* Students studying *GED Connection* at a distance may use any or all of the curricular components (print, video and two types of online activities). Students will be assigned proxy contact hours for viewing the videotape based upon self-report. For both the print and the online activities, proxy contact hours are awarded if the student completes a specified proportion of the activities. *Important: The decision about awarding proxy hours for workbook activity is based simply on whether or not the activities were done, not on the quality or correctness of the responses.* We will use the proxy contact hour assignments developed

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by Project IDEAL for the following activities:

Video: .5 hrs
Workbook: ≥75% of activities completed = 4 hrs; 50-74% = 2 hrs
Tests: 1 hour per test

However, our distance learning advisory committee was concerned that the proxy contact hours for the online activities established by Project IDEAL were too low for the amount of work involved. We surveyed classroom teachers using *GED Connection* to learn how much time, on average, they allot for students to complete these tasks in class. Based on the findings from that survey, we will use the following proxy hours for the online activities:

Internet Activities: 2 hours per activity
Modules: 4 hours per module

The procedure used by the state to develop proxy contact hours. If the state selects a curriculum for which no proxy contact hour values already exist, or if they decide the existing proxy contact hours are not appropriate for their state, the state will need to determine how many hours are appropriate. The state should describe the method they will use to assign proxy contact hours for each curricula. A brief outline of key issues is presented here; states should recognize that it is challenging to validate proxy contact hour assignments.

Determining proxy contact hour assignments includes, but is not limited to the following:

- Determine the level of validation the state needs. Is it sufficient to have an equivalent measure of a student physically attending a classroom course or does the state need proof of students engaging the materials or mastering the content?   This decision will help the state determine which model(s) are appropriate. For example, the clock time model provides data on the length of time students used the instructional materials, but no information about what the student learned. If the state wants proxy contact hours to reflect student learning, the mastery model is a better choice.

- Examine existing research on using the curriculum and the proxy contact hours established by other states or agencies. This information can provide a starting point for state efforts.

- Describe how proxy contact hours will be determined. Include the criteria for making decisions and the method for assigning hours. Identify the resources, people and time needed to determine proxy hours.

- Circulate proxy contact hour information to local adult education providers and train them in tracking and recording proxy contact hours accurately.

- Monitor assigned proxy contact hour values over time to determine if they are still appropriate and adjust as needed.

Examples Of Methods For Determining Proxy Contact Hours.

Example 1: *Conduct a study.* This provides a research basis for assigning proxy contact hours. One approach that has been used includes the following steps. Note that this is a very basic overview.

- Recruit a sample of classroom teachers to track how long they spend teaching the curriculum content in their classroom, on a unit by unit basis.

- Look at the average times for each unit and assign proxy contact hours based on that data - either a set number of proxy hours for every unit or proxy hours that vary by unit depending upon the amount of work involved.

- Recruit a sample of distance teachers to track how long it takes their students to complete the instructional units.

- Compare this to the proxy contact hour assignments established and adjust proxy contact hours as needed.

Example 2: *Convene a panel of experts.* This approach uses experts within the state to determine proxy contact hours for each curriculum. They review the curriculum on a unit by unit basis, may talk with both distance and classroom teachers and gather other relevant information, but do not conduct a full-blown study. As a group, they then assign proxy contact hours for the curriculum.

Supplemental instructional materials. The current NRS guidelines do not address the issue of tailored supplemental instructional materials assigned in addition to a primary curriculum in distance education programs, but many teachers use this approach to best meet students' needs. If states want to include supplemental assignments in their calculations of proxy contact hours, they should describe how supplemental instruction will be monitored and how proxy contact hours will be assigned in a consistent fashion.