

# NATIONAL COUNCIL FOR ONLINE EDUCATION

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May 6, 2020

Senator Mitch McConnell  
Majority Leader  
United States Senate  
317 Russell Senate Office Building  
Washington, DC 20510

Senator Chuck Schumer  
Minority Leader  
United States Senate  
322 Hart Senate Office Building  
Washington, DC 20510

Representative Nancy Pelosi  
Speaker of the House  
United States House of Representatives  
H-232, The Capitol  
Washington, DC 20515

Representative Kevin McCarthy  
Minority Leader  
United States House of Representatives  
H-204, The Capitol  
Washington, DC 20515

The Honorable Betsy DeVos  
Secretary of Education  
Lyndon Baines Johnson  
Department of Education Building  
400 Maryland Ave.  
Washington, DC 20202

Dear Senator McConnell, Senator Schumer, Representative Pelosi, Representative McCarthy, and Secretary DeVos --

The National Council for Online Education (NCOE) is a partnership between the Online Learning Consortium (OLC), Quality Matters (QM), University Professional and Continuing Education Association (UPCEA), and WICHE Cooperative for Educational Technologies (WCET). Together our organizations represent public and private, large and small, two year and four year institutions offering quality online learning throughout the United States.

As leaders in the field of online learning, the four organizations would like to express appreciation and admiration for the leadership that online educators and administrators are taking in helping minimize academic disruption across the nation. The quickness in which institutions have been able to transition face-to-face learning to remote learning has required tremendous effort and expense.

Over the next months and years the increased use of online education will serve a larger population of learners than could have been imagined even months ago. **To this end, we ask for your support: in providing additional funding for these students and institutions; by recognizing and qualifying distance education students as part of any future disbursement**



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**calculations; and to provide broad waiver authority to the Secretary of Education for a temporary period of time.** These actions are critical and will not only have an immediate impact on the lives of over a million students but will also assist institutions in preparing for the ongoing challenges of providing consistent, high quality educational offerings at time rife with uncertainty.

## **Include Distance Education Students in Direct Student Support**

**We request that future funding be adjusted to include students studying fully at a distance.**

According to the most recent IPEDS Fall Enrollment report, 16.7% of all higher education students were enrolled exclusively in distance education courses. That is roughly one-in-six of all postsecondary students, and that is simply too many students to be excluded from current and future assistance.

Those enrolled in distance programs are excluded from the CARES Act calculation, and we are seeing that they are receiving less direct assistance because of this, but they also have experienced adverse financial impacts as a result of Covid-19. We believe these students should be included in future calculations for federal assistance because:

- *Many distance students are adults who experienced significant financial losses.* While traditionally-aged resident students had to move home or off-campus, those are often one-time expenses and many of them will receive refunds for unused room and board. Meanwhile, many non-traditional students have had to deal with loss of childcare, working from home, loss of jobs, and additional care for family members. The fiscal and personal instability non-traditional students (estimated to be 900,000 undergraduate students in 2016-17) face is considerable.
- *Even online students rely upon the physical resources of their campuses.* According to the latest [Online College Students](#) survey conducted by Learning House,, two-thirds of distance students live within 50 miles of the institution in which they are enrolled. Many use on-site resources at the institution. For example, some students rely on the computers and high-speed internet of the institution to access their course or textbooks held in reserve at now-shuttered libraries. Because even these online students rely upon the physical resources of their campuses, they are significantly impacted by campus closures. In order to mitigate the loss of campus resources for these distance education students, some institutions are diverting other forms of aid to assist them, including assistance with hardware, software, and internet connectivity.
- *It is likely that many distance education students are experiencing similar financial losses as commuter students but are currently excluded from the calculation of CARES Act funds.* Current calculation of CARES Act funds appears to be based on the philosophy that the rapid closure of campuses and the transition to remote learning has financially



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impacted students who suddenly lost their room and board as well as access to campus services such as the internet and computer labs, as well as providing funds to colleges and universities for the purposes of creating online and distance education. As a result, emergency student aid is meant to assist in off-setting these expenses. However, distribution of the CARES Act funds also includes commuter students. These students are likely not experiencing financial stress due to the closure of dorms and dining halls but may be impacted by the loss of many campus services such as internet and computer labs. It is likely that many distance education students are experiencing similar financial losses as commuter students but are currently excluded from the distribution of CARES Act funds. Further, previous fully online students may be in environments where they are forced to upgrade internet services to both maintain their access and compensate for more users in their homes or purchase textbooks that may have been previously accessible through library reserves.

- *Many fully distance education students are now paying for essential instructional resources that previous face-to-face students are not required to pay for.* Additionally, some distance education students are required to pay “technology-support” or “online proctoring” fees at the beginning of each term. As institutions have pivoted to remote learning, many schools have absorbed the costs of these services for transitioned students. While this is laudable, it sets up an environment where fully distance education students are placed at an economic disadvantage as they have paid for services associated with online learning that other students are not required to.
- *The exclusion of distance education students from emergency assistance sends the message that they are second-class students undeserving of assistance.* Now more than ever it is critical that students feel valued and supported regardless of their educational modality. The exclusion of distance education students from the calculation, and therefore distribution of CARES Act funds not only fiscally disadvantages those students, but it inadvertently sends the message that they are second-class students who are undeserving of assistance.
- *The lack of direct CARES Act financial assistance to distance education students risks the continued enrollment of almost 17% of all students.* As the American economy undergoes a significant disruption, the need for an educated workforce is even more critical. Although it cannot guarantee continued enrollment, the emergency student financial assistance distributed through the CARES Act can help students offset continued educational costs. As institutions brace for uncertain summer and fall enrollments and possible significant enrollment declines, the lack of direct CARES Act financial assistance to institutions which include these distance education students risks the continued enrollment of almost 17% of all students.



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All students are experiencing financial hardship and we request that the excluded fully distance students be included in current and future calculations of aid related to Covid-19. **We also believe that additional support will be needed for all institutions as they develop and implement high quality online education offerings and provide the necessary technical and financial assistance that all students will need.** It is critical that all institutions, including those who are exclusively serving online students, be included in any future institutional financial assistance.

## Support Extensions of Department of Education Waivers

As institutions move from the emergency phase into planning for the summer and fall terms, the uncertainty of whether existing regulatory Covid-19 waivers from the Department of Education will be extended has hampered decision-making. **We support the request from the [Council of Regional Accrediting Commissions in the letter of April 21](#):**

*“Given the uncertainty that lies ahead, we urge you to expeditiously extend this critical flexibility through the 2020-21 academic year to allow institutions to make critical planning decisions necessary in the coming weeks.”*

In conclusion, we thank you for the tremendous support for higher education that Congress and the Department of Education provided to help institutions and their students battle the results of Covid-19. We trust that this letter has helped highlight the enormous and urgent challenges facing distance education students and the institutions that serve them. In future legislation and actions we strongly urge you to treat all students the same regardless of instructional modality. As organizational leaders in distance education, we stand ready to assist Congress and the Department of Education in any way possible as we all work together to strengthen America during this time of unprecedented challenges.

We appreciate your time and attention to these issues and we and our institutional members look forward to working with you.

Sincerely,



Jennifer Mathes  
CEO, Online Learning Consortium



Deb Adair  
Executive Director, Quality Matters



Bob Hansen  
CEO, UPCEA (University Professional and Continuing Education Association)



Russ Poulin  
Executive Director, WICHE Cooperative for Educational Technologies

