



CHAPTER 10



Online Classrooms: Is the TEACH Act Enough?

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Introduction

The Technology, Education, and Copyright Harmonization Act (TEACH Act) was passed by Congress and signed into law by President George W. Bush on November 2, 2002, in response to changes in distance education brought about by advances in technology in the preceding years. Fifteen years later, copyright considerations in distance education are as relevant as ever as the number of online courses being offered by colleges and universities grows each year. Digital Learning Compass' *Distance Education Enrollment Report 2017* shows that "in higher education, 29.7% of all students are taking at least one distance course... [with] 14.3% of students taking exclusively distance courses and 15.4%...taking a combination of distance and non-distance courses."¹ This is an increase of "3.9% over the previous year,"² and "this growth rate was higher than seen in either of the two previous years."³ Additionally, "blended" courses are being offered more frequently by higher education institutions. These courses, "also known as hybrid or mixed-mode courses, are classes where a portion of the traditional face-to-face instruction is replaced by web-based online learning."⁴ Even courses taught primarily through face-to-face instruction usually require students to engage with an online "course page" within the institution's Learning Management System (LMS),⁵ usually to access supplemental learning resources, take quizzes and tests, or, in the case of "flipped classrooms," watch recorded lectures posted to the course page before coming to class so that the content found in them can be discussed during class time.

A primary teaching practice in both face-to-face and online education settings involves students engaging with copyrighted works. Often this takes place via the class textbook, but it also includes the course instructor performing,⁶ displaying,⁷ copying, and distributing different types of copyrightable works including but not limited to images, graphical works, sound recordings, musical works, dramatic works, motion pictures, audiovisual works, and literary works.⁸ At the time of its passage, it was hoped that the TEACH Act would provide greater clarity and flexibility regarding how course instructors could share copyrighted works with students in an online learning environment and “establish a critical balance between the needs of educators and students on the one side and the rights of copyright holders on the other.”⁹ While it can be argued that the TEACH Act was an improvement over the distance education expectation previously found in Section 110(2),¹⁰ the language of the statute left many librarians and educators feeling confused regarding what types of works could be shared online with students and in what amounts. In the following sections, this chapter seeks to provide some clarity regarding how copyrighted works can be used in distance education under the TEACH Act and answer the question of “Is the TEACH Act enough?” to support online education and distance learning. Topics that will be covered include an overview of the law, reasons for utilizing (or not utilizing) the TEACH Act, best practices for campus compliance with the TEACH Act, tools and resources for learning more about the law, and non-TEACH Act options for using copyrighted works in online education.

An Overview of The TEACH Act

The TEACH Act is codified, primarily, in Section 110(2) of US copyright law (Title 17, United States Code). To take advantage of the TEACH Act, the institution must be a “governmental body or an accredited nonprofit educational institution.”¹¹ Information about accreditation requirements can be found in Subsection 11 of Section 110(2) of US copyright law.

The TEACH Act requires many members of the organization, including university administrators, attorneys, and information technology (IT) personnel, to come together to fulfill its requirements. The institution must have “policies regarding copyright”¹² in place and “[provide] infor-

mational materials to faculty, students, and relevant staff members that accurately describe, and promote compliance with, the laws of the United States relating to copyright.”¹³ When transmitting digital works online for distance education, the TEACH Act requires that “to the extent technologically feasible,”¹⁴ the transmission of works “is made solely for”¹⁵ and “the reception of such transmission is limited to”¹⁶ “students officially enrolled in the course for which the transmission is made”¹⁷ or to “officers or employees of governmental bodies”¹⁸ who may need access to them “as a part of their official duties or employment.”¹⁹ The institution utilizing the TEACH Act is also required to “[apply] technological measures that reasonably prevent”²⁰ those accessing the works from retaining them “for longer than the class session.”²¹ The institution may “not engage in conduct that could reasonably be expected to interfere with technological measures used by copyright owners to prevent such retention”²² by the users. It must also take reasonable measures to prevent “unauthorized further dissemination of...work[s]”²³ by the recipients to others.

Once these requirements are met, there is additional work to be done, however, as the TEACH Act also sets forth requirements that instructors teaching a course must adhere to, including:

- The work being shared online with students cannot be one “produced or marketed primarily for performance or display as part of mediated instructional activities transmitted via digital networks.”²⁴
- The copy used for the transmission must be “lawfully made and acquired under this title”²⁵ (Title 17 United States Code) and cannot be a copy that “the transmitting government body or accredited nonprofit educational institution knew or had reason to believe was not lawfully made and acquired.”²⁶
- The performance or display of copyrighted works must be “made by, at the direction of, or under the actual supervision of [the course] instructor as an integral part of a class session offered as a regular part of the systematic mediated instructional activities of...[the] institution.”²⁷
- “The performance or display [of copyrighted works must be] directly related and of material assistance to the teaching content of the transmission.”²⁸

Additionally, the course instructor must also consider the “amount” of the copyrighted work that can be shared under the TEACH Act, which varies by the type of work. The TEACH Act allows displays of works such as “general static images, whether of artworks, text, photographs, or other works”²⁹ “in an amount comparable to that which is typically displayed in the course of a live classroom session.”³⁰ The TEACH Act allows course instructors to make full performances of nondramatic literary works, such as “readings from a novel, textbook, or poetry,”³¹ and full performances of nondramatic musical works, examples of which include “playing a recording or actually performing a new a pop song or symphony.”³² However, the performance of “any other work,”³³ including performances of audiovisual recordings such as films, the performance of dramatic literary works such as plays, and the performance of dramatic musical works such as operas and Broadway musicals, is restricted by the TEACH Act to “reasonable and limited portions.”³⁴

Why Use the TEACH Act?

The TEACH Act provides users with both advantages and disadvantages. Perhaps the greatest advantage of utilizing the TEACH Act is the opportunity to mitigate legal risk for the institution. A “statutory exception” is “a provision in a statute exempting certain persons or conduct from the statute’s operation.”³⁵ The TEACH Act is an exception to the rightsholders statutory right to make a public performance or display of a work, and while it contains many detailed requirements, it does allow “a wide variety of uses of copyrighted works, without risk of copyright infringement...if the instructor and the educational institution take careful steps to implement the law.”³⁶

The greatest disadvantage of utilizing the TEACH Act is the number of requirements that must consistently be met to ensure compliance with the law. A decision to utilize the TEACH Act cannot be made lightly nor can compliance be ensured through the actions of a single individual. Compliance requires many members of a campus community coming together over the course of many months to ensure policies, educational practices, and technological measures are in place, and then,

after meeting these requirements initially, working together continue to ensure they remain in place.

Another distinct disadvantage of the TEACH Act is the restrictions placed on the number of copyrighted works that can be reused for educational purposes. While the display provision and the amounts of nondramatic literary and musical works that can be reused are clear, there is much debate surrounding exactly how much of “any other work”³⁷ can be used. The law does not provide an explanation of what is meant by the “reasonable and limited”³⁸ language it uses. A report put forward by the Senate³⁹ in 2001 states that “[w]hat constitutes a ‘reasonable and limited’ portion should take into account both the nature of the market for that type of work and the pedagogical purposes of the performance.” A Congressional Research Service report released in 2006 states, “The exhibition of an entire film may possibly constitute a ‘reasonable and limited’ demonstration if the film’s entire viewing is exceedingly relevant toward achieving an educational goal; however, the likelihood of an entire film portrayal being ‘reasonable and limited’ may be rare.”⁴⁰ These statements can provide some guidance on how to interpret the law and should be discussed with campus attorneys in order to determine the institution will define “reasonable and limited” based off the amount of legal risk they are comfortable undertaking. Another risk management consideration in utilizing the TEACH Act is tied to the Digital Millennium Copyright Act, or DMCA, that is found in Section 1201 of US copyright law. Section 1201(1)(A) states that “no person shall circumvent a technological measure that effectively controls access to a work protected under this title.” Much debate surrounds the application of the DMCA in conjunction with the exceptions found in US copyright law.⁴¹ As such, how the DMCA may impact an institution’s utilization of the TEACH Act will be a risk-management issue that must be carefully considered.

TEACH Act Best Practices

If an institution decides it will utilize the TEACH Act to provide students and faculty with access to copyrighted works in an online learning environment, there are some best practices they can consider to help ensure compliance.

Copyright Education

Librarians and administrators should work with legal counsel to establish a campus copyright policy based on US copyright law and then ensure that this policy is readily discoverable on the institution's website along with other quality educational materials about US copyright law. They should also identify campus partners who may be able to assist in educating members of the campus community about copyright compliance. More frequently, academic libraries are employing copyright librarians or have a member of the staff who, as part of their job responsibilities, is responsible for learning about and educating patrons about US copyright law. If the educational institution's library employs such a person, they may be a useful ally in developing a copyright education program and teaching it. Staff from the Office of General Counsel may be able to assist with these initiatives as well.

Restricting Access to Works

Most LMSs have a "course page" for each course taught at the institution each semester that is accessible to only the system administrators, course instructor, teaching assistants, and those students enrolled in the course. Users must log-in to the LMS using a username and password provided by the instructor to access their course pages. Unless a student takes an "incomplete" in a course, students' access to the LMS's course pages and learning materials posted there is usually terminated at the end of each semester. This type of limited access is ideally suited to meet the requirements of the TEACH Act, and institutions utilizing the TEACH Act should require course instructors to use the LMS when sharing copyrighted works with students online to help ensure compliance with the law.

Stream Sound Recordings and Audiovisual Works

Providing students with access to streaming versions of sound recordings and audiovisual works, rather than downloadable files, can help ensure they are unable "retain the work for longer than the class session"⁴² and can make it harder for students to disseminate copies of the works to others.

Using Lawfully Acquired Works

It will be important to help faculty understand how a lawfully acquired copy of works they wish to share can be acquired. Here, again, the institution's academic library can be a partner in this process by either acquiring copies of works for their collection or obtaining copies through legitimate library lending services such as interlibrary loan.

TEACH Act Tools and Resources

There are tools and resources available that can assist members of the campus community in learning more about the law and working through the requirements of the law, including

- the American Library Association's *Distance Education and the TEACH Act* webpage: <http://www.ala.org/advocacy/copyright/teachact>;
- *The TEACH Act—Online Performances*, a video lecture that is part of the *Copyright for Educators & Librarians* Massive Online Open Course (MOOC) created by Duke University, Emory University, The University of North Carolina at Chapel Hill: <https://www.coursera.org/learn/copyright-for-education/lecture/4qR-MU/the-teach-act-online-performances>; and
- *Copyright Checklist: Compliance with the TEACH Act*, developed for the Columbia University Libraries Copyright Advisory Office by Kenneth D. Crews: <http://etom.org/wp-content/uploads/2017/02/checklist-for-teach-act-and-distance-education.pdf>.

Non-TEACH Act Options for Using Copyrighted Works in Online Teaching

If the intended instructional use of a copyrighted work as part of online instruction does not fall within the scope of the TEACH Act, there are other options course instructors can consider for making the work available to students online. Additional options for providing online access to

copyrighted works while teaching include fair use, utilizing works made available through the library, using openly licensed works, and obtaining permission or a license to reuse works.

Fair Use

The application of the fair use exception found in Section 107 of the Copyright Act can be considered by course instructors when wanting to make works available to students in an online educational environment. The fair use statute reads:

Notwithstanding the provisions of sections 106 and 106A, the fair use of a copyrighted work, including such use by reproduction in copies or phonorecords or by any other means specified by that section, for purposes such as criticism, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research, is not an infringement of copyright. In determining whether the use made of a work in any particular case is a fair use the factors to be considered shall include—

- (1) the purpose and character of the use,⁴³ including whether such use is of a commercial nature or is for nonprofit educational purposes;
- (2) the nature of the copyrighted work;
- (3) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and
- (4) the effect of the use upon the potential market for or value of the copyrighted work.

The fact that a work is unpublished shall not itself bar a finding of fair use if such finding is made upon consideration of all the above factors.

There are tools and resources available that have been developed by reputable individuals and organizations that can help course instructors, librarians, campus administrators, and campus attorneys learn more about this exception and assist in making fair use determinations. They include

- *The Fair Use Evaluator*, developed by Michael Brewer and the American Library Association's Office for Information Technology Policy: <http://librarycopyright.net/resources/fairuse/index.php>;

- *The Fair Use Checklist*, developed by Kenneth D. Crews and Dwayne Butler for Columbia University's Copyright Advisory Office: <https://copyright.columbia.edu/content/dam/copyright/Precedent%20Docs/fairusechecklist.pdf>; and
- The Association of Research Libraries *Code of Best Practices in Fair Use for Academic and Research Libraries*: <http://www.arl.org/storage/documents/publications/code-of-best-practices-fair-use.pdf>.

Library Access

College and university libraries license access to millions of resources, including scholarly journals, electronic books (e-books), and streaming music and film databases for use by members of the campus community. Often, as part of the license agreement entered into between vendors and libraries, course instructors can place links to or embed these electronic resources in LMS course pages. Course instructors can contact their institution's library to learn more about their online offerings and digital collections, receive assistance in searching the library's catalog to see if the library currently has a copy of a desired work in its collection, determine reuse options for the work available under the license agreement (e.g., placing a physical copy of the work in the LMS or linking to it) and, if not, inquire if the library is able to acquire a digital copy for its collection.

Openly Licensed Works

Some rightsholders choose to share works they create with others using an open license. The Creative Commons (CC) licenses are a popular open license option available to the public that offers rightsholders "a simple, standardized way to grant copyright permissions to their creative work."⁴⁴ The CC offers six general types of licenses⁴⁵ that rightsholders can attach to works they create that allow others to "to copy, distribute, and make some uses of their [original] work."⁴⁶ These types of licenses are sometimes attached to scholarly research articles, monographs, and other resources that can be used in education, including data sets, graphics, and images. These types of openly licensed educational works are often referred to as "open access" (OA) works and is usually "digital, online, free of charge, and free of most copyright and licensing restrictions."⁴⁷ Course

instructors can share OA works online with students so long as they follow the terms of the license set forth by the rightsholder. The Directory of Open Access Journals (<https://doaj.org/>) provides a directory of Open Access journal titles that course instructors can use to find content on subjects they are teaching, and the Directory of Open Access Books (<https://www.doabooks.org/>) can be used to find books published under an open license.

Permissions and Licensing

Course instructors can also consider reaching out to the rightsholder to ask for their permission to share copyrighted works with students as part of course instruction. The permissions process involves identifying the rightsholder, drafting the permissions request, and tracking responses. The “Asking for Permission” webpage made available by Columbia University’s Copyright Advisory Office provides quality information on how to go about obtaining permission to reuse works: <https://copyright.columbia.edu/basics/permissions-and-licensing.html>. Licensing the use of works can also be considered. Licenses usually involve the paying of a fee to reuse copyrighted works in a particular way for a set period. Examples of licensing agencies include the Copyright Clearance Center (<http://www.copyright.com/>), Swank Motion Pictures (<https://www.swank.com/>), and BMI (<https://www.bmi.com/>).

Is the TEACH Act Enough?

Given the complexities of setting up a TEACH Act compliant campus, many educators ask themselves whether the TEACH Act is worth the trouble. The answer to this question will be unique to each educational institution. Some may say yes, choosing to utilize the TEACH Act for the sense of security it can provide. In these instances, institutions should be careful to fulfill all requirements found in the TEACH Act and, as a best practice, provide both print (e.g., training documentation, websites) and human resources (e.g., copyright librarian assistance, dedicated IT staff) to help guide course instructors and institutional staff through compliance requirements.

Some institutions will say no, that the TEACH Act is not enough, as they cannot comply with all requirements outlined in it or because they find the limits placed on the types and amount of works they can use under it are not the best fit for instructor's needs.

Surprisingly, the answer to this question could be both “yes” and “no” as nothing in the law prohibits educational institutions from considering multiple options for making copyrighted works available to students as part of online education. An institution could choose to put into place all of the utilize the policy and technological requirements outlined in the TEACH Act so that course instructors can consider utilizing it if it is the best fit for the reuse of copyrighted works in a distance education in certain situation, but when the reuse of a work does not fall within the scope of the TEACH Act, encourage course instructors to consider the application of the fair use exception, the utilization of licensed library resources, or permissions as alternatives for connecting course instructors and students with quality educational resources in an online education environment. The decision on which of these three options to utilize (saying “yes” to utilizing the TEACH Act, choosing not to utilize it, or taking a combined approach) should not be made by one person on campus. Rather, it should be made by a group of administrators, course instructors, librarians, and IT staff meeting as many times as needed to best understand teaching needs, pedagogical practices, technological infrastructure, and library resources available, and how these factors impact the situation. After initial policy and practice decisions are made, whatever they might be, informational resources and training opportunities on copyright compliance should be made readily available to course instructors. Additionally, the initial group of decision-makers should continue to meet on a regular basis to explore and discuss changes in the law, court rulings, technological advancements, and pedagogical practices to help ensure that the initial plan of action is still the best fit for the campus community. Attorneys representing the institution should be involved in each stage of this process, so they can give advice and recommendations to the group. Often, attorneys will approach these situations with the intent of mitigating legal risk as much as possible for the institution. While this is a good practice, the idea that “we may get sued over this” should not be used to place restrictions on course instructors and students that go beyond the force of law. Instead, when considering options for connecting students

with copyrighted works in an online education environment, institutions should work to identify the ways in which to best strike balance between the educational mission of the institution and the law.

Endnotes

1. Elaine Allen and Jeff Seaman, “Distance Education Enrollment Report 2017,” *Digital Learning Compass*, Online Learning Consortium, <https://onlinelearningsurvey.com/reports/digitallearningcompassenrollment2017.pdf>.
2. Allen and Seaman, “Distance Education.”
3. Ibid.
4. “Intro to Blended or Hybrid Learning,” University of Rhode Island, <https://web.uri.edu/online/what-is-blended-teaching/>.
5. These systems are also sometimes referred to as Content Management Systems (CMS). Examples include but are not limited to Canvas, Moodle, and Blackboard.
6. According to Section 101 of the Copyright Act, “[t]o ‘perform’ a work means to recite, render, play, dance, or act it, either directly or by means of any device or process or, in the case of a motion picture or other audiovisual work, to show its images in any sequence or to make the sounds accompanying it audible”; 17 U.S.C. § 101 (2012).
7. Section 101 of the Copyright Act provides that “[t]o ‘display’ a work means to show a copy of it, either directly or by means of a film, slide, television image, or any other device or process or, in the case of a motion picture or other audiovisual work, to show individual images nonsequentially”; Ibid.
8. The definitions of many of these types of “works,” including audiovisual work, literary works, pictorial, graphic, and sculptural works, sound recordings, and motion pictures can be found in Section 101 of US copyright law.
9. Laura N. Gasaway, “Balancing Copyright Concerns: The TEACH Act of 2001,” *EDUCAUSE Review*, 36, no. 6 (2001): 82.
10. See Laura N. Gasaway’s *TEACH Act Amended Section 110(2)* chart, found at <http://www.unc.edu/%7Euncnlg/TEACH.htm>, for a comparison of the “old” Section 110(2) language with the “new” TEACH Act.
11. 17 U.S.C. § 110(2)(A) (2012).
12. 17 U.S.C. § 110(2)(D)(i).
13. Ibid.
14. 17 U.S.C. § 110(2)(C).
15. Ibid.
16. Ibid.
17. 17 U.S.C. § 110(2)(C)(i).
18. 17 U.S.C. § 110(2)(C)(ii).
19. Ibid.
20. 17 U.S.C. § 110(2)(D)(ii)(I).
21. 17 U.S.C. § 110(2)(D)(ii)(I)(aa).
22. 17 U.S.C. § 110(2)(D)(ii)(II).
23. 17 U.S.C. § 110(2)(D)(ii)(I)(bb).
24. 17 U.S.C. § 110(2).
25. Ibid.

26. Ibid.
27. 17 U.S.C. § 110(2)(A).
28. 17 U.S.C. § 110(2)(B).
29. Kenneth D. Crews, "Copyright and Distance Education," *Change* 35, no. 6 (2003): 38.
30. 17 U.S.C. § 110(2).
31. Crews, "Copyright and Distance Education," 38.
32. Ibid.
33. 17 U.S.C. § 110(2).
34. Ibid.
35. Bryan A. Garner, *Black's Law Dictionary* (St. Paul: Thomson/West), 262.
36. Crews, "Copyright and Distance Education," 34–39.
37. 17 U.S.C. § 110(2).
38. Ibid.
39. U.S. Congress, Senate, Technology, Education and Copyright Harmonization Act of 2001. 107th Cong., 1st sess., 2001, S. Doc. 7, serial 107–31, 7–8.
40. Melville B. Nimmer and David Nimmer, *Nimmer on Copyright*, § 8.15[C][2][a] (2006).
41. Arguments have been made that if a copy of a work is being made in compliance with US copyright law (e.g., under one of the exceptions such as fair use or the TEACH Act), a violation of the DMCA will not occur. The courts have been somewhat divided on this issue though. See *Chamberlin Group Inc. v. Skylink Technologies, Inc.* (381 F.3d. 1178 Fed. Cir. 2004) for more information.
42. 17 U.S.C. § 110(2)(D)(ii)(I)(aa).
43. When determining the purpose and character of a use, the Supreme Court tell us that consideration should be given "to what extent it is 'transformative,' altering the original with new expression, meaning, or message..." *Campbell v. Acuff-Rose Music, Inc.*, 510 U.S. 569 (1994). Transformativeness within the context of educational uses is a subject of much debate. Additional information on transformativeness in online education can be found in the Association of Research Libraries' *Code of Best Practices in Fair Use for Academic and Research Libraries* that can be accessed online at <http://www.arl.org/storage/documents/publications/code-of-best-practices-fair-use.pdf>.
44. Information about these six licenses can be found online at <https://creativecommons.org/licenses/>. There is a seventh CC license, the CC0 license, that rightsholders can use to place their works in the public domain. More information about this specific license can be found online at <https://creativecommons.org/share-your-work/public-domain/cc0/>.
45. "About the Licenses," Creative Commons, <https://creativecommons.org/licenses/>.
46. Ibid.
47. Peter Suber, *Open Access* (Cambridge: MIT Press), 4.

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