

The TEACH Act: Bringing Copyright Law for Distance Education Closer to the Digital Age

by Linda K. Enghagen, J.D.

Introduction

Advancements in information technology increasingly find their way into the everyday world of educational environments. Communicating by e-mail, creating course-based web sites, utilizing educational software, and developing distance education courses name only a few of the common applications of information technology in modern education. Like in business environments, integrating the use of information technol-

ogy into the everyday world of Education, and Copyright Harmonization Act, 2002).

The purpose of the TEACH Act was to bring certain aspects of copyright law into the digital age. As stated in the House Report issued in its support: "...the 'TEACH Act' updates the distance education provisions of the Copyright Act for the 21st Century" (Sessenbrenner, 2002, p. 2). Similarly, both houses of Congress acknowledged the importance and implications of bringing the law up to date.

Education is the means by which we develop our nation's human resources. In this information age, marked by both cooperation and competition on a global scale, the ability of the United States to meet its domestic and international challenges and re-

are among the most pressing legal issues higher education will face over the next five years (Pressing Legal Issues..., 2004). Furthermore, though not cited in relation to distance education in particular, two of the experts identified the legal implications of institutions increasingly looking to create new revenue streams as traditional sources of financial support shrink (Pressing Legal Issues..., 2004). Distance education is one possible source of revenue.

"Education is the means by which we develop our nation's human resources."

ogy into the everyday world of educators requires doing so in the context of, among other things, the legal environment of the technologies implemented and their specific applications (e.g. learning management systems used to deliver academic courses versus corporate training). In the particular case of distance education courses, traditional copyright law with its fair use defense was supplemented when the Technology, Education, and Copyright Harmonization (TEACH) Act of 2002 became law on November 2, 2002 (Technology,

sponsibilities is directly dependent on its educational capacity. That capacity in turn will be determined by the quality of our educational programs and their reach to all sectors of the public. For our nation to maintain its competitive edge, it will need to extend education beyond children and young adults to lifelong learning for working adults, and to reach all students of all income levels, in cities and rural settings, in schools and on campuses, in the workplace, at home, and at times selected by students to meet their needs. Digital distance education helps make this possible... (Sessenbrenner, 2002, p. 2).

The increasing significance of legal issues related to the use of information technologies in institutions of higher education is evidenced elsewhere as well. While neither the TEACH Act nor any other specific statute was referenced, according to interviews with ten experts in higher education law, legal issues related to technology, the Internet, computer security, online privacy, identity theft and distance education

Distance Education Becomes Ordinary

Distance education is a broad term used to refer to a variety of means by which educators deliver academic instruction. In its report to Congress, the U.S. Copyright Office defined it as "a form of education in which students are separated from their instructors by time and/or space" (Peters, 1999, p. 9). Despite the range of mediums subsumed under such a broad definition "...the Internet has become the medium of choice because of its low delivery costs and simultaneous (and asynchronous) communication capabilities" (Garon, 2002, p. 149). As a result of the utilization of the Internet in

Linda K. Enghagen, J.D. is an associate professor at the University of Massachusetts in Amherst, Massachusetts USA.

the delivery of distance education courses, the terms distance education and online education are often used interchangeably.

Undoubtedly, the low delivery cost of online courses contributes to their widespread popularity. According to a 2003 Sloan Consortium survey, "over 1.6 million students took at least one online course during Fall 2002" and "over one-third of these students (578,000) took all of their courses online" (Allen & Seaman, 2003, p.1). In contrast, research released in 2004 by the Sloan Consortium shows increasing numbers of students taking online classes with "over 1.9 million students studying online in the fall of 2003" and projections for fall of 2004 figures to exceed 2.6 million (Allen & Seaman, 2004, p. 1). Looking at it from an institutional standpoint, over 80% of all colleges and universities offer at least one course that is either fully online or blended with 34% offering complete online degree programs (Allen & Seaman, 2003, p. 2). Public institutions demonstrated the highest levels of involvement in online offerings with 97% offering at least one online or blended course and 49% offering online degree programs (Allen & Seaman, 2003, p. 2).

Hospitality Education Online

Nationwide, a number of institutions of higher education offer online degree programs in hospitality related fields. The online version of Peterson's Guide to Distance Learning (2003) was used to identify them. To locate specific degree programs from the online guide, one or more "Courses of

Table 1 Credit-Based Hospitality Degree Programs	
Institution	Degree(s)
Florida International University	B.S.—Hospitality Management M.S.—Exec. Master's in Hospitality Management
New York Insti. of Technology	B.P.S.—Hospitality Management
Northern Arizona University	B.S.—Hotel & Restaurant Management
Southern New Hampshire Univ.	M.S.—Hospitality Administration
Texas Tech University	M.S.—Restaurant, Hotel & Insti. Mngmt.
The Pennsylvania State Univ.	A.A.S.—Hotel, Restaurant & Insti. Mngmt.
Thomas Edison State College	A.A.S.—Hotel/Motel/Restaurant Mngmt.
Tompkins Cortland C.C.	A.A.S.—Hotel & Restaurant Management
University of Alabama	B.S.H.E.S.—Restaurant & Hospitality Management
University of Delaware	B.S.—Hotel, Restaurant & Insti. Management
Univ. of Mass. at Amherst	B.S.—Hospitality & Tourism Management
Univ. of Minn.-Crookston	A.A.S.—Hotel, Restaurant & Insti. Management
University of North Texas	M.S.—Hospitality Management
University of Wisconsin-Stout	B.S.—Hotel, Restaurant & Tourism Management M.S.—Hospitality & Tourism

Study" must be selected from a drop down tab. Those selected were: 'hospitality management', 'hospitality/recreation marketing operations', 'hospitality services management related', 'hotel and restaurant management', and 'hotel/motel services marketing operations'. That search yielded the following institutions offering credit-based degree programs.

Consequently, within the field of hospitality education, these programs stand to benefit from the enactment of the TEACH Act and the expanded rights it affords users of certain types of copyright protected works incorporated into distance education courses.

Background of the TEACH Act

While the TEACH Act didn't become law until 2002, Congress recognized the need to more spe-

cifically address certain aspects of copyright law in the context of distance education when it enacted the Digital Millennium Copyright Act (DMCA) in 1998. Existing copyright law specifically prohibited certain practices in distance education courses that were specifically allowed in traditional face-to-face classrooms. That is, existing copyright law allowed educators to, for example, perform dramatic works or display visual artwork in a face-to-face classroom setting (Copyright Act, 17 U.S.C. § 110(1)). However, digitizing and transmit-

ting those same works in a distance education course was specifically prohibited (Copyright Act, 17 U.S.C. § 110 (2)). This posed obvious problems for educators when delivering courses via a distance education medium. The technological capacity existed to digitize analog works, but it wasn't legal to do so. This constraint prevented students enrolled in distance education courses from receiving the same educational experience as

the Copyright Office were submitted to Congress by the Register of Copyrights in the spring of 1999. The report's recommendations included the following:

1. eliminate the physical classroom requirement;
2. specifically authorize digital transmissions;
3. expand the categories of works that may be transmitted digitally; and
4. create safeguards to adequately protect the interests of copyright owners (Peters, 1999).

As enacted, the TEACH Act followed each of these recommendations.

relevant laws. For example, if a particular use of a copyright protected work is not permitted even after compliance with the TEACH Act, its use may nonetheless be lawful under the fair use provisions of copyright law.

Third, the scope of the TEACH Act is directed at in-class activities. It does not apply to "course packs, electronic reserves, and other printed course materials. ... The

"For our nation to maintain its competitive edge, it will need to extend education beyond children and young adults to lifelong learning for working adults, and to reach all students of all income levels, in cities and rural settings, in schools and on campuses, in the workplace, at home, and at times selected by students to meet their needs."

those enrolled in the same course being taught by the same instructor but in a traditional face-to-face classroom. Consequently, a provision was included in the DMCA directing the Copyright Office to examine the issues raised by this gap between legality and technological capacity and submit "recommendations on how to promote distance education through digital technologies, including interactive digital networks, while maintaining an appropriate balance between the rights of copyright owners and the needs of users of copyrighted works" (Sessenbrenner, 2002, p. 3) The recommendations of

Common Misconceptions

Before examining the manner in which Congress implemented these recommendations, it is important to address common misperceptions about the TEACH Act. First, compliance is optional (Copyright Act, 17 U.S.C. §112(f)). That is, accredited nonprofit educational institutions are not required to satisfy its requirements. Institutions may choose to do so, and having done so, are entitled to the expanded rights it affords.

Second, the TEACH Act supplements, not supplants existing laws (Ashley, 2004). Consequently, institutions that decline to comply simply proceed under other relevant law (e.g. copyright law, fair use, licensing agreements). Further, even if an institution complies with the TEACH Act, it may continue to rely on other

TEACH Act's primary purpose is to enable the performance and display of copyrighted works in the online classroom, parallel to how such materials are shown or displayed in a live classroom. ... The TEACH Act is not a substitute for having students buy or use textbooks or other course materials outside the classroom..." (Ashley, 2004, p. 5).

Finally, the use of a secure learning management system does not, by itself, satisfy the requirements of copyright compliance (Ashley, 2004, p. 5). Learning management systems are not designed to identify and prevent the

illegal copying and distribution of copyright protected works. While secure from the general public, authorized faculty members, staff and students remain able to copy and distribute copyright protected works in manners that may violate applicable copyright law and licensing agreements.

General Framework of Copyright Law

The TEACH Act is best understood by first placing it in the general framework of the field of copyright law. Copyright law is part of a larger field of law, intellectual property law, which includes patent law and trademark law. Recognizing its importance, the Founding Fathers highlighted it in the U.S. Constitution (1787) authorizing Congress to create an appropriate regulatory environment.

The Congress shall have Power ...To promote the Progress of Science and useful Arts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries (Article I, Section 8, Clause 8).

As established in the U.S. Constitution, the primary purpose of what is now known as intellectual property law is to "promote the progress of science and useful arts..." In other words, its primary purpose is to advance society by promoting progress. Recognizing that creators (i.e. authors and inventors) need an incentive to engage in creative activities (that often fail or have no commercial value), the very language of the Constitution establishes the framework in which Congress is directed to balance the interests of society in promoting progress and the interests of authors and inven-

tors. That is, Congress is directed to permit authors and inventors to retain exclusive (not absolute) rights in their creations for limited periods of time.

In the specific case of copyright law, copyright owners possess five exclusive rights for the duration of the copyright. These rights are the right to reproduce the work, distribute the work, create derivative works from the original work, and publicly perform and display the work (Copyright Act, 17 U.S.C. §106). Because the primary purpose of all intellectual property law is to promote the progress of science and the useful arts, these rights are exclusive and not absolute. That is, the copyright owners possess these rights, but users have rights too. To facilitate the progress of science and the useful arts, Congress recognized the need to define circumstances under which certain uses of copyright protected works were allowed without requiring the permission of the copyright owner and without the payment of any royalties or licensing fees (Copyright Act, 17 U.S.C. §107).

Prior to the enactment of the TEACH Act, the primary tool relied on by educators was the fair use provisions of copyright law. As long as the use of the materials was for research, scholarship or classroom use and the fair use factors were satisfied, instructors could lawfully use copyright protected works owned by others without obtaining their permission and without paying any royalties or licensing fees.

Because of the limitations of the law prior to the enactment of the TEACH Act, educators were limited in their ability to use certain types of materials in distance education courses. The TEACH Act is designed to strike the balance required by the Founding Fathers in the Constitution in the context of modern information technologies.

The Classroom and Transmission Problems

As noted earlier, the TEACH Act was conceived and enacted to address certain limitations of earlier copyright law. Specifically, under prior copyright law the ability of educators to display and perform copyright protected works in classrooms was limited to face-to-face classrooms and similar settings which typically were understood to include such situations as closed-circuit television broadcasts to another classroom. The TEACH Act addresses the transmission of displays of performances of copyright protected works in distance education courses. That is, it deals with the display and performance of works that an instructor uses in class. It doesn't apply to supplemental materials such as e-reserves that

are assigned to students for use on their own time (Ashley, 2004). Existing copyright law with its fair use provisions as well as such mechanisms as licensing agreements must be used when utilizing copyright protected works in those ways.

The TEACH Act doesn't alter the exemption given educators under prior versions of copyright law (Copyright Act, 17 U.S.C. §110(1)). Consequently, in traditional face-to-face classrooms, educators continue to enjoy broad rights to display and perform the copyright protected works owned by others without permission or payment of any royalties or licensing fees to the copyright owner. This applies to any work in any medium. The only real limitation under this provision is that the copy used must be a lawful copy (e.g. purchased not pirated).

In contrast, the TEACH Act does alter the Copyright Act consistent with the recommendations of the Copyright Office Report in relation to distance education courses (Copyright Act, 17 U.S.C. §110(2)). Under the new rules, instructors at accredited nonprofit educational institutions are given expanded rights to use copyright protected works in digitally transmitted courses. Specifically, instructors are now allowed to digitally transmit the performance of an entire non-dramatic literary or musical work as well as "reasonable and limited" portions of all other works (e.g. videotapes, films, dramatic musical works). Further, instructors may digitally transmit displays of works such as still images in amounts comparable to that used in face-to-face classroom settings.

Institutional Obligations Under the TEACH Act

As noted earlier, only accredited nonprofit educational institutions (or governmental bodies) are eligible for the expanded rights under the TEACH Act (Copyright Act, 17 U.S.C. §110(2)(A)). But even their rights are subject to a number of conditions. Generally, the conditions are of three types: those dealing with copyright compliance, those dealing with the manner in which the copyright protected materials are utilized, and those dealing with the nature of the technologies employed.

Institutions possess three responsibilities in regard to copyright compliance under the TEACH Act. First, institutions must provide notice to students enrolled in distance education courses that material transmitted in the course may be protected by copyright law (Copyright Act, 17 U.S.C. §110(2)(D)(i)). The TEACH Act does not specify the specific language to be used in the notice. Some educational institutions offer sample language on their web sites. For example, North Carolina State University's popular The TEACH Toolkit web site suggests:

The TEACH Act Copyright Notice: The materials on this course Web site are only for the use of students enrolled in this course for purposes associated with this course and may not be retained for further dissemination (The TEACH Toolkit, 2003).

Second, institutions must adopt and maintain institutional policies in regard to copyright compliance. Like the requirement of the copyright notice, Congress isn't explicit about what such policies should address or contain (Copyright Act, 17 U.S.C. §110(2)(D)(i)). Presumably, such poli-

cies would address such things as e-reserves, coursepacks, course design, and students' course assignments (e.g. web sites, multi-media projects). A variation on the approach taken by North Carolina State University is that taken by Kankakee Community College. Its site literally links the two requirements by including a link to its copyright policies within its TEACH Act Copyright Notice.

The TEACH Act Copyright Notice: The materials on this course web site are only for the use of students enrolled in this course for purposes associated with this course and may not be retained or further disseminated. Further, information regarding KCC's copyright policy is available at <http://www.kcc-online.org/copyright/policy.html> (TEACH Act Notice, 2003).

Kankakee Community College employs a general copyright policy that addresses the use of copyright protected works by faculty, staff and students. Further, it outlines copyright compliance in regard to computer software and databases, and student works. Its specific language is as follows.

KCC Copyright Policy I. Introduction

It is the policy of Kankakee Community College that its faculty, staff, and students carry out their work in an open and free atmosphere, and that consistent with applicable laws and policy they publish the results of such work without restraint.

This policy cannot substitute for a careful reading of the entire Copyright Law. It is suggested that this be printed separately and distributed to the faculty as a quick-reference tool.

II. Scope and Coverage

This policy applies to the faculty, staff, and students of the college.

III. Use of Copyrighted Works by Faculty, Staff, and Students

- a. The college is committed to complying with all applicable laws regarding copyrights. As an institution devoted to the creation, discovery and dissemination of knowledge, the college supports the responsible, good faith exercise of full fair use rights, as codified in federal law at 17 U.S.C. § 107, by faculty, staff and students in teaching, research, and service activities.
- b. Except as allowed by law, it is a violation of this policy and law for college faculty, staff, or stu-

dents to reproduce, distribute, display publicly, perform, digitally transmit (in the case of sound recordings), or prepare derivative works based upon a copyrighted work without permission of the copyright owner.

IV. Computer Software and Databases

- a. Back-up copies
One back-up copy of computer software may be made for archival purposes in case the original is destroyed.
- b. Computer Laboratories
Except for the back-up copy exemption above, software may not be duplicated without appropriate licenses or agreements.
- c. Multiple Loading
Loading programs into several computers for simultaneous use is only permitted with permission or a license.
- d. Networks
Computer software may not be used in a network (LAN or WAN) without permission or a license.
- e. Database Downloading
Downloading from a database is an infringement. Short-term, single-use retention is "accepted" by the copyright owners as a fair use, but long-term retention and multiple use of data requires a license.

V. Student Works

- a. Student Works are papers, computer programs, artistic and musical works, and other creative works made by College students.
- b. Students shall own copyright in Student Works except in the following cases:
 - Student Works that constitute notes of classroom

and laboratory lectures and exercises shall not be used for commercial purposes by the student generating such notes.

- Student Works created in the course of the student's employment by the college shall be considered Works Made for Hire (KCC Copyright Policy, 2003).

The approach taken in this policy is to lay out the general expectations for everyone in the college community in regard to copyright compliance highlighting some of the most common contexts in which questions arise. The web site then provides additional links including further information concerning the Digital Millennium Copyright Act, the TEACH Act, Fair Use, Permissions as well as more detailed information and tutorials for both students and employees. It's worth noting that KCC took a general approach in its policy. Essentially, the policy satisfies the TEACH Act requirement by simply stating that copyright compliance is required of faculty, staff and students at KCC. The TEACH Act does not require extensive or detailed policies.

Technological Requirements

In addition to the creation of copyright policies, posting of a copyright notice and providing faculty, staff and students with copyright information, the TEACH Act imposes certain technological requirements on institutions that choose to avail themselves of its expanded rights (Copyright Act, 17 U.S.C. §110(2)(D)(ii)). As described by Georgia Harper on the University of Texas web site, institutions are required to:

Apply technological measures that reasonably prevent re-

cipients from retaining the works beyond the class session and further distributing them; and

Not interfere with technological measures taken by copyright owners that prevent retention and distribution (emphasis in original) (The TEACH Act Finally Becomes Law, 2002).

KCC's TEACH Act copyright notice includes a reference to these requirements in the portion of the language which states: "The materials on this course web site are only for ... purposes associated with this course and may not be retained or further disseminated" (TEACH Act Notice, 2003).

Hospitality Degree Programs and the TEACH Act

Generally, the TEACH Act is not widely utilized. The law's complexity, vagueness (Carnevale, 2003) and uncertainty (Ashley, 2004) are commonly cited impediments. Early on, even institutions with extensive online programs like the University of Maryland University College and North Carolina State University expressed reservations

about the TEACH Act (Carnevale, 2003). Based on a review of information available from the web sites of each of the fourteen institutions with some type of online hospitality degree program identified in Table 1, few rely on the TEACH Act.

To determine whether an institution relies on the TEACH Act, the home page of each institution identified in Table 1 was accessed. Then the web site was searched utilizing two phrases: "TEACH Act Notice" and "Copyright Use Policies." These phrases were selected because the TEACH Act conditions its expanded protections on an institution posting such a notice and implementing such policies. Based on this search of their web sites, of the fourteen institutions of higher education of-

Table 2

TEACH Act Compliant

Institution	TEACH Act Notice	TEACH Act Copyright Use Policy
Florida International University	No	No
New York Insti. Of Technology	No	No
Northern Arizona University	Yes	Yes
Southern New Hampshire Univ.	Yes	Yes
Texas Tech University	No	No
The Pennsylvania State Univ.	Yes	Yes
Thomas Edison State College	No	No
Tompkins Cortland C.C.	No	No
University of Alabama	No	No
University of Delaware	No	No
Univ. of Mass. at Amherst	No	No
Univ. of Minn.-Crookston	No	No
University of North Texas	No	No
University of Wisconsin-Stout	No	No

fering online hospitality degrees, only three are TEACH Act compliant: Northern Arizona University, Southern New Hampshire University, and The Pennsylvania State University (Florida International University, 2004, New York Institute of Technology, 2004, Northern Arizona University, 2004, Southern New Hampshire University, 2004, Texas Tech University, 2004, The Pennsylvania State University, 2004, Thomas Edison State College, 2004, Tompkins Cortland Community College, 2004, University of Alabama, 2004, University of Delaware, 2004, University of Massachusetts at Amherst, 2004, University of Minnesota-Crookston, 2004, University of North Texas, 2004, University of Wisconsin-Stout, 2004).

While not unique to hospitality programs, hospitality programs are among the disciplines that can most benefit from the TEACH Act. Lab classes are a staple in hospitality education and lab classes are among the more difficult to replicate in a distance education environment. The TEACH Act affords greater opportunities for using commercial film and video in a demonstration lab format in lieu of traditional live labs.

Conclusion

While the TEACH Act brings copyright law for distance education closer to that of traditional face-to-face classrooms, it does so in a manner that requires the implementation of appropriate policies and technological capabilities. Further, it requires institutions of higher education to provide faculty, students and staff with information concerning copyright laws. Undoubtedly, the need to comply with these prerequisites inhibits the speed and

ease with which institutions seek to avail themselves of the additional rights afforded by the TEACH Act's provisions. Nevertheless, hospitality programs are among the disciplines that stand to most benefit from compliance because of the increased possibilities for using commercial film and video in lab-based courses.

References

- Allen, I.E. & Seaman, J. (November 2004). Entering the mainstream: the quality and extent of online education in the United States—2003 and 2004, *The Sloan Consortium*, Retrieved on November 15, 2004 from http://www.sloan-c.org/resources/entering_mainstream.pdf.
- Allen, I.E. & Seaman, J. (September 2003). Sizing the opportunity: the quality and extent of online education in the United States—2002 and 2003, *The Sloan Consortium*, Retrieved on December 9, 2003 from <http://www.sloan-c.org/resources/survey.asp>.
- Ashley, C.L. (June 22, 2004). The TEACH act: higher education challenges for compliance, *EDUCAUSE Center for Applied Research*, Vol. 2004, Issue 13.
- Carnevale, D. (March 28, 2003). Slow start for long-awaited easing of copyright restriction, *The Chronicle of Higher Education*, Vol. 49, Issue 29, p. A29.
- Copyright Act, 17 U.S.C. §101 et seq.
- Digital Millennium Copyright Act, Pub. L. No. 105-304, 112 Stat. 2860 (October 28, 1998).
- Florida International University. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.fiu.edu>.
- Garon, J. (Spring 2002). The electronic jungle: the application of intellectual property law to distance education, *Vanderbilt Journal of Entertainment Law & Practice*, 4 Vand. J. Ent. L. & Practice 146.
- Harper, G. (2002). The TEACH act finally becomes law, *Copyright Crash Course*, Retrieved on October 6, 2004 from <http://www.utsystem.edu/ocg/intellectualproperty/teachact.htm>.
- KCC copyright policy. (2003). *Copyright Policy & Procedures—Kankakee Community College*, Retrieved on January 20, 2004 from <http://www.kcc-online.org/copyright/policy/html>.
- New York Institute of Technology. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.nyit.edu>.
- Northern Arizona University. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.nau.edu>.
- Peters, M. (May 1999). Report on copyright and digital distance education, *U.S. Copyright Office*, Retrieved on September 12, 2003 from http://www.loc.gov/copyright/docs/de_rpt.pdf.
- Peterson's guide to distance learning programs. (2003). Retrieved on December 9, 2003 from <http://iiswinprd03.petersons.com/distancelearning/code/namerresults.asp>.
- Pressing legal issues: 10 views of the next 5 years. (June 25, 2004) *The Chronicle of Higher Education*, Vol. 50, Issue, 42, p. B4.
- Sensenbrenner, F.J. (September 25, 2002) Report of the house committee on the judiciary, technology, education, and copyright harmonization act of 2002. *House of Representatives Report* 107-687.
- Southern New Hampshire University. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.snhu.edu>.
- TEACH act notice. (2003) Copyright Policy & Procedures—Kankakee Community College, Retrieved on January 20, 2004 from <http://www.kcc-online.org/copyright/teach-notice.html>.
- Texas Tech University. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.ttu.edu>.
- Technology, Education, and Copyright Harmonization Act of 2002, 17 U.S.C. § 110(2), 112 f) (2002).
- The Pennsylvania State University. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.psu.edu>.
- The TEACH act toolkit: an online resource for understanding copyright and distance education. (2003).
- North Carolina State University Libraries, Retrieved on January 20, 2004 from <http://www.Lib.ncsu.edu/scc/legislative/teachkit/notice.html>.
- Thomas Edison State College. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.tesc.edu>.
- Tompkins Cortland Community College. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.sunyccc.edu>.
- U.S. Constitution, Article I, Section 8, Clause 8 (1787).
- University of Alabama. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.ua.edu>.
- University of Delaware. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.udel.edu>.
- University of Massachusetts at Amherst. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.umass.edu>.
- University of Minnesota-Crookston. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.crk.umn.edu>.
- University of North Texas. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.unt.edu>.
- University of Wisconsin-Stout. (2004). Homepage, Retrieved on November 17, 2004 from <http://www.uwstout.edu>.

Copyright of Journal of Hospitality & Tourism Education is the property of International CHRIE and its content may not be copied or emailed to multiple sites or posted to a listserv without the copyright holder's express written permission. However, users may print, download, or email articles for individual use.