

ORIGINAL ARTICLE

THE IMPACTS OF THE NEW ON-SITE EXTERNAL EVALUATION INSTRUMENTS: WHAT TO EXPECT OF CHANGES FOR COURSES AND HEIS IN DISTANCE EDUCATION?

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ABSTRACT

This article analyzes the impacts of the new SINAES external evaluation instruments regarding the Distance Education regulatory framework established by Decree No. 12.456/2025. Methodologically, a qualitative, documentary, and prospective research is conducted, examining current legislation and INEP's public consultation proposals. Results evidence a break with the flexible 2017 model, imposing rigor in verifying on-site attendance, support center infrastructure, and pedagogical mediation qualification. It is concluded that HEIs will need to restructure academic management to prove teaching-learning effectiveness in the new evaluation cycle.

Keywords: SINAES; higher education regulation; distance education; on-site evaluation; academic management.

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OS IMPACTOS DOS NOVOS INSTRUMENTOS DE AVALIAÇÃO EXTERNA IN LOCO: O QUE ESPERAR DE MUDANÇAS PARA OS CURSOS E AS IES NA EDUCAÇÃO A DISTÂNCIA?

RESUMO

Este artigo analisa os impactos dos novos instrumentos de avaliação externa do SINAES frente ao marco regulatório da Educação a Distância, estabelecido pelo Decreto nº 12.456/2025. Metodologicamente, realiza-se uma pesquisa qualitativa, documental e prospectiva, examinando a legislação vigente e as propostas do INEP em consulta pública. Os resultados evidenciam uma ruptura com o modelo flexível de 2017, impondo rigor na verificação da presencialidade, infraestrutura de polos e qualificação da mediação pedagógica. Conclui-se que as IES precisarão reestruturar a gestão acadêmica para comprovar a efetividade do ensino-aprendizagem no novo ciclo avaliativo.

Palavras-chave: SINAES; regulação da educação superior; educação a distância; avaliação in loco; gestão acadêmica.

LOS IMPACTOS DE LOS NUEVOS INSTRUMENTOS DE EVALUACIÓN EXTERNA IN SITU: ¿QUÉ CAMBIOS SE PUEDEN ESPERAR PARA LOS CURSOS Y LAS IES EN LA EDUCACIÓN A DISTANCIA?

RESUMEN

Este artículo analiza los impactos de los nuevos instrumentos de evaluación externa del SINAES frente al marco regulatorio de la Educación a Distancia, establecido por el Decreto n.º 12.456/2025. Metodológicamente, se realiza una investigación cualitativa, documental y prospectiva, examinando la legislación vigente y las propuestas del INEP sometidas a consulta pública. Los resultados evidencian una ruptura con el modelo flexible de 2017, imponiendo rigor en la verificación de la presencialidad, la infraestructura de los polos y la cualificación de la mediación pedagógica. Se concluye que las IES deberán reestructurar la gestión académica para demostrar la efectividad del proceso de enseñanza-aprendizaje en el nuevo ciclo de evaluación.

Palabras clave: SINAES; regulación de la educación superior; educación a distancia; evaluación in situ; gestión académica.

1 Introduction

The trajectory of higher education evaluation in Brazil, supported over the last two decades by the National Higher Education Evaluation System - SINAES, established by Law No. 10.861 of April 14, 2004, cannot be understood separately from the regulatory movements that govern course provision and the operation of Higher Education Institutions - HEIs. There is an intrinsic and codependent relationship between the regulatory standard, which establishes the rules for offering undergraduate courses, and the evaluation instrument, which verifies whether institutions and their courses adhere to those rules and to the quality of the educational process. Historically, every significant change in the legal framework for education, especially with regard to Distance Education - DE, has reverberated in the reconfiguration of on-site external evaluation matrices, requiring the Anísio Teixeira National Institute for Educational Studies and Research - INEP to make adaptations that have ranged between the specialization of indicators and an attempt to unify evaluation criteria.

In this evolving scenario, Decree No. 5.622 of December 19, 2005 represented a decisive milestone by regulating Article 80 of the National Education Guidelines and Framework Law - LDB and establishing the parameters for offering DE with an emphasis on mandatory in-person activities (MELLO et al., 2023). By stipulating that student assessment, mandatory internships, the defense of final course papers, and laboratory activities should take place in person (BRASIL, 2005), the decree shaped the guidelines for academic processes and for the physical structure required to offer DE, consolidating the role of in-person support centers - PAPs. This legal requirement directly affected the evaluation instruments used between 2006 and 2016, which had to incorporate specific indicators to verify the existence and adequacy of these decentralized processes and infrastructures, as well as the qualifications of the tutoring staff, a central figure in the pedagogical model designed at the time.

The evaluation instruments in force during that period reflected this concern with the specific nature of distance course provision. Documents such as the 2008 course evaluation instrument and its subsequent revisions included indicators exclusive to DE, such as verification of the "coherence between the PPC and the Distance Education model used," analysis of the "effectiveness in the use of general mechanisms of interaction among professors, students, and tutors," and evaluation of the "facilities for the team of tutors and professors" (BRASIL, 2008; BRASIL, 2010). There was, therefore, recognition that the pedagogical and administrative architecture of DE required a particularized evaluative perspective, distinct from that applied to in-person courses, seeking to ensure that technological mediation did not compromise the quality of education.

A significant turning point in this trajectory occurred with Decree No. 9.057 of May 25, 2017, which updated DE regulation by introducing a more flexible approach to provision. By allowing institutions to be accredited exclusively for distance education, without requiring prior accreditation for in-person provision, and by allowing accredited HEIs to open new in-person support centers independently of prior authorization, the decree changed the system's expansion dynamics (BRASIL, 2017a). This regulatory change shifted the State's axis of control, which became more dependent on the results of evaluation processes and quality indicators to monitor a rapidly growing provision network¹ (MELLO et al., 2023, p. 9s).

¹ The regulatory flexibility promoted in 2017 was a determining factor in accelerating the expansion of DE in Brazil. Data from the 2023 Higher Education Census demonstrate this transformation. In 2020, for the first time in the historical series, the number of entrants to distance undergraduate programs (about 2 million) exceeded the number entering in-person programs (about 1.7 million); in 2023, this gap widened, so that new DE students represented 62.8% of all new higher education students that year. The number of places offered in DE also reached a record, exceeding 19 million in 2023, while total enrollments in the mode reached 4.9 million, corresponding to 49.2% of all undergraduate enrollments. This significant growth, concentrated mainly in the private network (which then accounted for 95.9% of DE enrollments), raised questions and concerns within the Ministry of Education about ensuring educational quality, culminating in the revision of the regulatory framework and evaluation processes for this mode in 2025 (INEP, 2024).

Alongside the flexibility introduced by the new decree, there was a movement toward consolidating and unifying the evaluation instruments. Beginning with Technical Note DAES/INEP No.

8/2015, a process was initiated to integrate the different evaluation matrices into a more cohesive model, culminating in the publication, in 2017, of unified instruments for the different types of programs (teacher education, bachelor's degrees, and technology degrees) and for in-person and distance provision (BRASIL, 2017c). Although this unification was intended to increase equality of treatment and simplify the system's operation, it ultimately diluted some of the specific features of DE evaluation. Indicators that had previously detailed tutoring activities or support-center infrastructure were absorbed into more generic categories or addressed transversally, which generated debate about the capacity of these new instruments to capture the nuances of increasingly massive and digitalized pedagogical models (COSTA et al., 2022, p. 11; CAVALCANTI; GUERRA; GOMES, 2021, p. 17).

This mismatch between the rapid evolution of educational technologies, the expansion of provision driven by the 2017 regulatory framework, and the generalization of evaluation instruments created a scenario of tension that extends to the present. The need to revise this model, seeking a balance between regulating provision and ensuring quality through an evaluation more closely aligned with institutional realities, is what motivates the discussions about the new instruments held in 2025. The current context therefore requires a prospective analysis that considers not only the standards in force, but also how external evaluation can induce management practices that ensure the academic and social effectiveness of HEIs.

Methodologically, this study is characterized as qualitative and exploratory research based on documentary and bibliographic review (MARCONI; LAKATOS, 2003, p. 174-188; GIL, 2002, p. 41s). The body of the analysis primarily comprises the educational legislation in force, with an emphasis on the evolution of DE regulatory frameworks, and the technical documents made available by INEP concerning on-site external evaluation instruments. Data analysis will follow a comparative and prospective approach, contrasting the requirements of previous evaluation cycles with the new guidelines proposed in the INEP public consultation held in 2025. The text is therefore structured by starting with the historical and regulatory context, proceeding to an examination of the new legal framework approved in 2025 and the new evaluation dimensions proposed, and concluding with a projection of the managerial implications for Distance Education beginning in 2026.

2 The New DE Regulatory Framework Following Decree 12.456/2025

Understanding the evolutionary dynamics of higher education in Brazil, outlined in the previous section, reveals a dynamic relationship between flexibility and control, culminating in a scenario of accelerated DE expansion between 2017 and 2024 and creating new demands for regulation and quality assurance. If the previous period was marked by regulatory openness that enabled the mass expansion of access, the current moment, inaugurated in 2025, reflects a strategic turning point by the State in its effort to reorder the provision of distance courses. In this context, the publication of Decree No. 12.456 of May 19, 2025 represents a profound restructuring of DE in the country (BRASIL, 2025a).

This new legal directive, regulated by MEC Ordinance No. 506 of July 10, 2025, emerges as a response to the gaps left by the previous framework, embodied in Decree No. 9.057 of May 25, 2017 and Normative Ordinance No. 11 of June 20, 2017. While the 2017 legislation prioritized HEI autonomy in expanding support centers and offering courses, often separating growth from installed capacity verified on site, the new 2025 framework reestablishes State control over entry and continued participation in the system. The emphasis shifts from facilitating provision to ensuring the effectiveness of the teaching-learning process, introducing stricter parameters for in-person attendance, pedagogical mediation, and support infrastructure (BRASIL, 2017a; BRASIL, 2017b; BRASIL, 2025a; BRASIL, 2025b).

One of the most structural changes introduced by Decree No. 12.456/2025 concerns the very conception of delivery modes. The legal text abandons the previous rigid dichotomy and institutionalizes blended provision as a distinct category, with specific workload and infrastructure requirements. This change seeks to mitigate the proliferation of courses that, under the 2017 legislation, operated with minimal in-person attendance, often in fields requiring intensive practical training. MEC Ordinance No. 506/2025 gives effect to this view by defining clear percentages for in-person and mediated synchronous activities, establishing that educational quality cannot dispense with direct interaction and adequate physical support, thereby reversing the logic of "total virtualization" that had gained ground in the previous period (BRASIL, 2025a; BRASIL, 2025b).

In addition to redefining delivery modes, the new regulatory framework imposes significant restrictions on the expansion of the network of in-person support centers, one of the central features of the growth observed in recent years. Whereas in 2017 the opening of centers was conditioned almost exclusively on the Institution's Institutional Rating - CI, the 2025 rules restore the need for a strict link between the institution's demonstrated quality and its capacity for expansion, limiting the number of new centers allowed annually according to the HEI's performance in external evaluations (BRASIL, 2017b; BRASIL, 2025d). This measure, combined with the requirement for more robust physical infrastructure, signals a return to the material presence of the educational institution, in which the center is once again conceived as an academic space that provides effective support to students.

Another prominent point in the new legislation is the qualification of pedagogical mediation. The 2025 Decree and its implementing ordinance establish parameters for the work of tutors and mediators, setting maximum student-to-professor ratios in synchronous activities and requiring specific training for these professionals. This directive contrasts with the 2017 framework, which allowed large-scale tutoring models with little qualified interaction. The clear intention is to ensure that technology serves as a means of bringing people closer rather than creating pedagogical distance, guaranteeing that DE students have access to academic support commensurate with the complexity of their education.

These regulatory changes directly affect the logic used to verify quality, rendering obsolete the evaluation instruments designed under the previous framework. The introduction of concepts such as mediated synchronous activities, a clear distinction among delivery modes, and new infrastructure restrictions requires INEP to develop new tools capable of measuring these variables accurately. It is within this context of readjustment that the proposals for the new on-site external evaluation instruments arise; they must translate the requirements for greater rigor and in-person attendance established by the new legislation into verifiable indicators, a topic that will be analyzed in detail in the next section of this study.

3 From the New Evaluation Cycle to the Structure of the New Instruments

The reconfiguration of the higher education regulatory framework, consolidated in 2025, does not operate in isolation; it requires a restructuring of quality-verification mechanisms. In this regard, the proposal for the new on-site external evaluation instruments, presented by INEP and submitted to public consultation throughout 2025, should not be understood merely as an update of indicators, but as an integral part of a systemic reformulation of the SINAES evaluation cycle. Before examining the proposed dimensions, it is necessary to understand the new evaluation flow in which these instruments will be applied, since the evaluation logic is no longer centered exclusively on the individuality of each course and instead adopts a broader, sector-based perspective.

The paradigmatic change proposed by INEP lies in the transition from a model of point-in-time evaluation, often disconnected from the specific features of fields of study, to an evaluation organized by broad fields of knowledge. To operationalize this directive, the Brazilian adaptation of the International Standard Classification of Education - CINE Brasil is used as a reference for grouping undergraduate courses. This structural reorganization seeks to overcome the generality of the instruments in force since 2017, allowing the evaluative perspective to consider the pedagogical and infrastructure particularities inherent in each field of knowledge, whether health, engineering, humanities, or exact sciences².

² The International Standard Classification of Education - CINE, adapted for Brazil, organizes undergraduate courses into 10 broad general fields, such as 01 Education; 02 Arts and humanities; 03 Social Sciences, communication and information; 04 Business, administration and law; 05 Natural sciences, mathematics and statistics; 06 Computing and Information and Communication Technologies (ICT); 07 Engineering, manufacturing and construction; 08 Agriculture, forestry, fisheries and veterinary; 09 Health and well-being; and 10 Services. This structure makes it possible to group courses with pedagogical and infrastructure affinities for evaluation purposes (BRASIL, 2025c, p. 13).

This new organization underpins the proposal for a new three-year evaluation cycle designed to integrate the three main SINAES processes: the National Student Performance Examination - ENADE, on-site evaluation, and Institutional Self-Evaluation. Unlike the previous model, in which on-site evaluation occurred mainly in response to regulatory demands (recognition or renewal) and was often out of step with ENADE, the new proposal synchronizes these processes. As shown in Figure 1, the new cycle provides that, each year, a specific group of CINE Brasil fields will be the priority focus of evaluation activities. While one group of fields takes ENADE, another may be undergoing external on-site evaluation, and a third may be consolidating its self-evaluation processes, ensuring that, by the end of the three-year period, all courses have undergone the three evaluation stages (INEP, 2025).

Figure 1 – New SINAES Evaluation Cycle Starting in 2025



Source: (TEIXEIRA, 2025, p. 15)

It is within this new logic of flow and grouping that the new external evaluation instruments are situated, introducing a modular architecture and breaking with the unified structure in force since 2017, which used a single instrument for all fields and delivery modes. The new model consists of a matrix of three common dimensions, applicable to all courses regardless of field, which interacts with a fourth specific dimension designed to capture the particularities of the broad CINE Brasil fields. Although the proposed structure retains the classic organization of the three dimensions, it makes substantial changes to the conception and detailing of the elements evaluated, seeking to align on-site verification with the requirements for greater rigor and in-person attendance established by Decree No. 12.456/2025.

Before examining the innovations of the new instrument proposed in 2025 in greater depth, a critical analysis of the evaluation instrument in force since 2017, used for course recognition and

renewal of recognition, is necessary. Examination of the matrix of that instrument shows that, of all the indicators that comprise it, approximately twelve address the particularities of distance provision or have analysis criteria exclusive to these courses. These indicators are concentrated mainly in Dimensions 1 (Didactic-Pedagogical Organization) and 2 (Teaching and Tutoring Staff), addressing topics such as the structuring of tutoring activities (Indicator 1.14); the adequacy of the Virtual Learning Environment - VLE (Indicator 1.17); the existence and functionality of the multidisciplinary team (Indicator 2.2); and the qualifications and experience of the tutoring staff (Indicators 2.13 and 2.14). In Dimension 3 (Infrastructure), the specific features of DE appear less frequently and are basically limited to teaching laboratories (Indicators 3.8 and 3.9), teaching-material logistics (Indicator 3.14), and professional environments linked to the centers (Indicator 3.18), reflecting the regulatory logic of that period, which tended to dematerialize the requirement for physical infrastructure in PAPs in favor of logistical and virtual solutions (BRASIL, 2017c).

This configuration of the 2017 instrument reveals a conception of evaluation that, although seeking to integrate delivery modes into a single document, ultimately treats distance education through appendices or adaptations of in-person logic, with strong emphasis on the tutor and on making content available through the VLE. A close analysis of the criteria suggests that the instrument was designed for a DE model focused on mass provision and asynchronicity, in which "interaction" (Indicators 1.19 and 2.15) is verified more through the existence of formal mechanisms than through the pedagogical effectiveness of mediation. In light of the current reality, characterized by the hybridization of education and the requirement for greater in-person attendance brought about by the new 2025 regulatory framework, this instrument proves insufficient to capture the nuances of the academic quality required, validating processes that often meet documentary requirements for tutoring and teaching materials but have limitations in delivering a robust and practical learning experience to students.

Given the need to realign evaluation processes with the contemporary dynamics of higher education, INEP undertook prospective studies aimed at restructuring the dimensions of external evaluation. This institutional effort sought to reflect transformations in the educational system by revising the objects of evaluation to ensure their alignment with current quality parameters and regulatory, pedagogical, and social requirements. The culmination of this process was the presentation of the new instruments, submitted to public consultation between June 18 and July 18, 2025³, a collective construction movement that recorded 4,491 contributions from the academic community and civil society⁴.

³ The launch of the public consultation and the technical presentation of the proposal were broadcast at an official INEP event, available at: <<https://www.youtube.com/live/R1fhB0KLxss>>.

⁴ Data on participation and the consolidation of contributions are detailed on the 'Participa + Brasil' platform, available at: <<https://www.gov.br/participamaibrasil/instrumento-de-avaliacao-in-loco-de-cursos-de-graduacao-dimensoes-comuns>>.

The proposal presented breaks with the architecture of the 2017 instrument, abandoning the logic of subjective "Indicators" and "Analysis Criteria" to adopt a structure based on "Objects of Evaluation." In this new system, each Object is broken down into "Attributes" and their respective "Qualifiers," establishing an objective and cumulative evaluation matrix. The assignment of ratings, maintained on the scale from 1 to 5, ceases to depend on interpretation of the degree of sufficiency, such as "sufficient," "very good/very well," or "excellent," and becomes conditional on the full and progressive fulfillment of the requirements. To achieve Rating 3, for example, the course must meet all qualifiers of the attribute corresponding to level 2, plus the requirements of the level 3 attribute, and so on up to the level of excellence, requiring concrete evidence at each stage (INEP, 2025a).

The proposal to reformulate the on-site external evaluation instrument is not limited solely to restructuring the dimensions common to all courses; it advances to an unprecedented level of specificity with the introduction of Dimension 4, dedicated exclusively to Objects of Evaluation by Field. Following

the CINE Brasil grouping logic, this new dimension establishes verification criteria designed to capture the educational and infrastructure particularities of each broad field of knowledge and training, which receive indicators aligned with their practical nature and orientation toward the labor market⁵. This segmentation allows evaluation to transcend the barrier of genericity, requiring institutions not only to meet cross-cutting requirements but also to demonstrate competencies, laboratory resources, and pedagogical practices intrinsic to the identity of each field. This represents a qualitative leap in the State's capacity to assess the relevance and soundness of the education offered by undergraduate courses, especially in a context of expansion and diversification of educational provision⁶.

⁵ The specific public consultation for Dimension 4 in the fields of Engineering, Manufacturing and Construction; Education; and Health and Well-Being was made available on the 'Participa + Brasil' platform, available at: <<https://www.gov.br/participamaisbrasil/inep>>.

⁶ The public consultation for Dimension 4 in the fields of Social Sciences, Communication and Information; Administration, Business and Law; Arts and Humanities; and Higher Technology Courses (CST) was also held in 2025, with details available at: <<https://brasilparticipativo.presidencia.gov.br/processes/sinaes>>.

In a comparative analysis, the proposal for the new 2025 instrument is considerably denser and more comprehensive than its predecessor, expanding the scope of verification to areas previously addressed transversally or given less weight. While the 2017 instrument concentrated evaluation on generic indicators, the new matrix details specific Objects for strategic topics, such as the graduate follow-up policy, which ceases to be merely a one-off element and becomes a structured component for evaluating the social and professional effectiveness of education. This expansion of requirements reflects the intention to capture the complexity of current academic management, requiring HEIs not only to formalize processes but also to demonstrate effective results in student education and professional placement, significantly raising the degree of State regulatory demands on undergraduate course provision in the country.

4 Impacts of the New External Evaluation Proposal on DE Courses and HEIs

Implementation of the new evaluation cycle designed by INEP for on-site visits beginning in 2026 does not represent merely a procedural change, but a profound reconfiguration of the logic used to verify quality, with direct and substantial implications for the format of distance course provision. It is essential to note that, in the process of constructing this proposal, the specific nature of technology-mediated education was not treated marginally; on the contrary, it involved the dedicated work of a Field Advisory Committee - CAA specifically for Distance Education, which worked in coordination with the committee responsible for the common dimensions. The result is an instrument that introduces cross-cutting attributes and qualifiers requiring HEIs to demonstrate unequivocally the materiality and effectiveness of pedagogical processes, challenging the mass-management model that prevailed over the last decade.

In the analysis of Dimension 1 (Didactic-Pedagogical Organization), the most immediate impact on courses lies in the need to demonstrate the operationalization of what the new instrument calls the "Learning Management Program" (Object 1.5). For undergraduate programs offered at a distance or in a blended format, this entails moving beyond the simple provision of content in Virtual Learning Environments - VLEs. Course coordinators will need to present concrete evidence (*analytics* reports), minutes of calibration meetings, and records of pedagogical interventions demonstrating that the student's learning path is actively monitored (INEP, 2025a; INEP, 2025b). The requirement for attributes that demonstrate the "identification of students with learning difficulties" and the "provision of timely pedagogical support actions" imposes a level of academic management focused on the individual, which many DE structures designed for large-scale service will have difficulty meeting without revising their tutoring and follow-up processes.

With Decree No. 12.456/2025 in force, which establishes minimum percentages for physical in-person and mediated synchronous activities, the external evaluation instrument for undergraduate programs will require the course to demonstrate how this workload is actually fulfilled. It will not be enough to provide for meeting times in the Course Pedagogical Project - PPC; it will be necessary to prove, through auditable biometric or digital attendance records, that the student participated in these activities (BRASIL, 2025a). This requirement directly affects curricular organization, forcing a shift from purely self-instructional subjects to hybrid models in which synchrony and physical presence are structural components of grades and attendance rather than merely sporadic evaluation events.

Regarding Dimension 2 (Teaching and Tutoring Staff), the proposed new instrument aligns with MEC Ordinance No. 506/2025 by distinguishing and qualifying the different teaching roles, generating financial and operational impacts. The Objects of evaluation dealing with the work of the multidisciplinary team and, specifically, pedagogical mediation introduce qualifiers that verify the numerical ratio between teaching mediators and students. The imposition of limits on synchronous activities (such as the ratio of 1 professor to 70 students) will require HEIs to resize their staff (BRASIL, 2025d). In addition, the instrument encourages the existence of a body of pedagogical mediators with specific qualifications in the field of the courses in which they work. To obtain ratings of excellence, it is not enough for the mediator to hold a qualification in the field; evidence of their "training in the use of digital technologies and active methodologies" and of their coordinated work with the professor responsible for the subject is required (INEP, 2025a). This demands that HEIs implement robust continuing education programs and revise the contractual duties of these professionals, who cease to be mere responders to questions and assume an active role in learning management.

Dimension 3 (Infrastructure), in turn, brings the most tangible impact on networks of in-person support centers, since the new instrument, especially Object 3.7 (Distance Education Centers), restores the central role of PAPs as educational spaces. Whereas in the previous cycle infrastructure could be validated on the basis of generic partnerships and virtual libraries, the new matrix, connected to the requirements of Dimension 04 (Fields of Knowledge), requires verification of the physical adequacy of in-person laboratories (INEP, 2025c). For courses in fields such as Health and Engineering offered at a distance, this means that the HEI must prove the existence, at the center, of facilities compatible with the National Curriculum Guidelines - DCNs and with the specific requirements of the field. An expansion strategy based on centers with leaner, more administrative infrastructure becomes unviable for courses requiring practical activities, forcing institutions to make substantial investments in physical adaptation or to reduce the reach of their provision in these specific fields.

The depth of the changes imposed by the new evaluation cycle requires, beyond descriptive analysis, an exercise in systematization that highlights the contrast between the paradigm in force through 2024 and the new model that will be imposed beginning in 2026. The reconfiguration is not limited to wording adjustments in indicators; it is a structural change in the very conception of what constitutes quality in distance education. Whereas the 2017 instrument operated according to a logic of adapting in-person criteria to DE, often making infrastructure and synchronous-interaction requirements more flexible in favor of expansion, the 2025 proposal reverses this logic. It establishes strict parameters of materiality and in-person attendance, anchored in Decree No. 12.456/2025, which transform external evaluation into a mechanism for verifying pedagogical effectiveness and make it less focused on documentary compliance. To illustrate the magnitude of this transition and its practical effects on the evaluation dimensions, Table 1 presents a comparative summary of the two models. It highlights how critical themes for DE, such as tutoring activities, support-center infrastructure, and the specific nature of fields of knowledge, were reconceived, moving from a generic approach to specific and regulated treatment that directly affects the academic and operational management of HEIs.

Table 1 – Summary of Changes for DE in the New External Course Evaluation Instrument

Dimension / Theme	2017 Instrument (In Force Through 2024)	Proposed 2025 Instrument (Cycle Beginning in 2026)
General Evaluation Logic	Based on subjective Indicators and Analysis Criteria (scales from 'sufficient' to 'excellent'). Focus on the existence of processes and documents.	Based on Objects, Attributes, and Qualifiers. Cumulative and objective logic for assigning ratings. Focus on evidence of effectiveness and results.
Dimension 1: Interaction and Mediation	Evaluated the existence of mechanisms for 'procedures to monitor and evaluate teaching-learning processes' (Indicator 1.19) in a generic manner. Effectiveness was presumed from the availability of tools in the VLE.	Requires proof of mediated synchronous activities (Object 1.5 - Learning Management), with records of attendance and effective interaction, aligned with the limit on students per mediator.
Dimension 2: Tutoring and Teaching	Focused on the tutor's qualifications and experience (Indicators 2.13 to 2.15), without a clear distinction of duties or strict numerical service limits.	Introduces the role of the Pedagogical Mediator and distinguishes its duties from those of the Professor Responsible. Verifies the student/mediator ratio and specific qualifications for the use of technologies and active methodologies.
Dimension 3: Support-Center Infrastructure	Flexible requirements, often validated through agreements and virtual libraries. Focus on teaching laboratories and material logistics (Indicators 3.8 and 3.14).	Restores the requirement for real and adequate physical infrastructure at the centers (Objects 3.3, 6.4, and 3.7), including study spaces and mandatory physical laboratories for courses requiring practical activities.
Dimension 4: Fields of Knowledge	Nonexistent. Evaluation used a single generic instrument for all courses, regardless of field (Health, Engineering, Teacher Education, etc.).	Creates Dimension 4 with Field-Specific Modules (CINE Brasil). Evaluates laboratories, pedagogical practices, and internship settings according to the nature of the course, preventing the 'standardization' of DE for complex fields.
In-Person Attendance and Practical Activities	Verification focused on in-person evaluation moments (examinations). Laboratory practices could be simulated or concentrated in a few meetings.	Requires proof of the physical in-person workload (minimum 10% or 30% in blended provision) and real physical laboratories. Virtual simulators do not fully replace real practice.

Source: Prepared by the author based on BRASIL (2017a; 2017b; 2017c; 2025a; 2025b) and INEP (2025a).

These changes in the on-site evaluation instruments for undergraduate programs pressure the senior management of HEIs to realign the Institutional Development Plan - PDI and the Institutional Pedagogical Project - PPI. Management will need to integrate academic data systems (*Data Warehouses*, *Business Intelligence*) capable of generating the student follow-up evidence required by evaluators. The "culture of evidence" ceases to be a differentiator and becomes a requirement for regulatory survival. In addition, the management of support-center networks will need to shift from a commercial expansion model to a decentralized academic management model in which the HEI's headquarters has effective, real-time control over the quality of activities carried out at the endpoints, under penalty of sanctions in institutional reaccreditation or course recognition processes.

In view of this challenging scenario, HEI management must prioritize strengthening data-intelligence and meta-evaluation sectors, such as the Internal Evaluation Committees - CPAs. These bodies may be capable of anticipating the diagnoses that external committees will make by using the new instruments to conduct simulations of on-site evaluation in courses and centers. Another strategic action is to professionalize the coordination of DE courses so that these managers are fluent in learning-data analysis, able to intervene in mediation processes, and able to ensure coherence between what is planned in the PPC and what is carried out on the platform. It is also important for HEIs to invest in the curation of educational technologies that not only deliver content but also generate detailed engagement and learning reports, providing the supporting evidence needed to face the rigor of the new SINAES evaluation cycle.

5 Conclusion

The analysis undertaken throughout this study shows that 2025 represents a turning point in the trajectory of Distance Education in Brazil, marking the end of a cycle of flexible expansion and the beginning of a new regulatory era guided by rigor in verifying materiality and pedagogical effectiveness. The enactment of Decree No. 12.456/2025 and the consequent restructuring of SINAES external evaluation instruments are not isolated movements, but rather the State's response to a diagnosis of asymmetry between the expansion and quality of provision, seeking to rebalance the equation between mass access and consistent education.

A fundamental finding that emerges from this scenario is that the DE model supported by minimal infrastructure and generic pedagogical mediation has become unviable under the new regulatory framework. The introduction of concepts such as mandatory physical attendance, a numerical limit on the student/mediator ratio, and the requirement for real laboratories for specific courses imposes an unprecedented management challenge on Higher Education Institutions. The focus is no longer basically on meeting documentary requirements, but on demonstrating, through data and concrete structures, that the teaching-learning process takes place with the same depth and support regardless of the delivery mode.

For distance and blended undergraduate courses, the new evaluation cycle of on-site visits scheduled to begin in 2026 will require a profound review of their Pedagogical Projects. The transition to hybrid curricula that organically integrate mediated synchronous activities and in-person practices will cease to be an option for differentiation and will become a condition for regulatory survival. In this context, academic management will need to become more professional in the analysis of learning data, using engagement and proficiency indicators not only for student retention or as evidence of teaching quality before external evaluation committees, but mainly for educating good professionals through these courses.

Although these conclusions are supported by an updated and robust documentary framework, it is important to emphasize that the study presents limitations inherent in its prospective nature. The analyses developed here are based on the publications of the new instruments submitted to public consultation and on INEP's preliminary guidelines. Although they indicate a clear trend toward stricter regulation, the final documents may undergo specific adjustments to their attributes or qualifiers after approval, which will require continuous monitoring by managers and researchers in the field for a full understanding of the definitive impact of these measures.

In view of this challenging and still developing scenario, the most lasting impact of these changes will possibly be the renewed appreciation of the teaching staff, in-person attendance in the support-center network, and the institutional dimension. The HEIs that will succeed in this new context will be those that structure a robust and qualified body of professors and mediators; invest in a network of in-person support centers with adequate infrastructure; implement academic systems that provide pedagogical processes centered on high-quality practical and dialogical experience; and strengthen their self-evaluation and governance processes, transforming the CPA into a strategic intelligence body. The capacity to anticipate diagnoses, correct course, and demonstrate the social effectiveness of their work will be the decisive competitive and regulatory differentiator for the sustainability of HEIs in the complex ecosystem of Brazilian higher education in the coming years.

References

- BRASIL. Decreto nº 5.622, de 19 de dezembro de 2005. **Regulamenta o art. 80 da Lei nº 9.394, de 20 de dezembro de 1996, que estabelece as diretrizes e bases da educação nacional.** Diário Oficial da União, Brasília, DF, 20 dez. 2005.
- BRASIL. Ministério da Educação. **Instrumento de Avaliação de Cursos de Graduação presencial e a distância.** Brasília: INEP, 2008.
- BRASIL. Ministério da Educação. **Instrumento de Avaliação para Renovação de Reconhecimento de Cursos de Graduação.** Brasília: INEP, 2010.
- BRASIL. Ministério da Educação. **Nota Técnica DAES/INEP nº 008/2015. Revisão do Instrumento de Avaliação de Cursos de Graduação.** Brasília: INEP, 2015.
- BRASIL. Decreto nº 9.057, de 25 de maio de 2017. **Regulamenta o art. 80 da Lei nº 9.394, de 20 de dezembro de 1996, que estabelece as diretrizes e bases da educação nacional.** Diário Oficial da União, Brasília, DF, 26 maio 2017a.
- BRASIL. Ministério da Educação. Portaria Normativa nº 11, de 20 de junho de 2017. **Estabelece normas para o credenciamento de instituições e a oferta de cursos superiores a distância, em conformidade com o Decreto nº 9.057, de 25 de maio de 2017.** Diário Oficial da União, Brasília, DF, 21 jun. 2017b.
- BRASIL. Ministério da Educação. **Instrumento de Avaliação de Cursos de Graduação presencial e a distância: Reconhecimento e Renovação de Reconhecimento.** Brasília: INEP, 2017c.
- BRASIL. Decreto nº 12.456, de 19 de maio de 2025. **Dispõe sobre a oferta de educação a distância por instituições de educação superior em cursos de graduação e altera o Decreto nº 9.235, de 15 de dezembro de 2017.** Diário Oficial da União, Brasília, DF, 20 maio 2025a.
- BRASIL. Ministério da Educação. Portaria MEC nº 506, de 10 de julho de 2025. **Regulamenta o Decreto nº 12.456, de 19 de maio de 2025, que trata da oferta de educação a distância por Instituições de Educação Superior - IES em cursos de graduação.** Diário Oficial da União, Brasília, DF, 11 jul. 2025b.
- BRASIL. Instituto Nacional de Estudos e Pesquisas Educacionais Anísio Teixeira (Inep). **Manual para classificação dos cursos de graduação e sequenciais de formação específica: Cine Brasil.** Brasília, DF: Inep, 2025c.
- CAVALCANTI, L. M. R.; GUERRA, M.; GOMES, C. S. F.. Avaliação de Cursos do Ensino Superior no Brasil: SINAES na sua relação com a qualidade. **Eccos-Revista Científica**, n. 56, JAN-MAR 2021.
- COSTA, B. R. L. *et al.*. Meta-avaliação do SINAES: a visão dos avaliadores ad hoc. **Diálogo**, Canoas, n. 50, p. 01-16, nov. 2022.
- GIL, A. C.. **Como Elaborar Projetos de Pesquisa**. 4. ed. São Paulo: Atlas, 2002.
- INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA - INEP. **Censo da Educação Superior 2023: divulgação dos resultados.** Brasília, DF: INEP, 2024.
- INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA - INEP. **Novo Instrumento de Avaliação Externa de Cursos de Graduação (Presencial e a Distância): Dimensões 1, 2 e 3.** Minuta para Consulta Pública. Brasília: INEP, 2025a.
- INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA - INEP. **Apresentação da Diretoria de Avaliação da Educação Superior (DAES) sobre Avaliação in loco.** Brasília, 2025b. Apresentação em slides, 21 p.
- INSTITUTO NACIONAL DE ESTUDOS E PESQUISAS EDUCACIONAIS ANÍSIO TEIXEIRA - INEP. **Área Transversal: Cursos EaD e Cursos Semipresenciais.** Brasília, 2025c. Apresentação em slides, 43 p.
- MARCONI, M. A.; LAKATOS, E. M.. **Fundamentos de Metodologia Científica**. 5. ed. São Paulo: Atlas, 2003.
- MELLO, S. L. M. *et al.* Promover a inclusão e a equidade no Ensino Superior: este é o papel da Educação a Distância no Brasil?. **Ensaio: Avaliação e Políticas Públicas em Educação**, Rio de Janeiro, v. 31, n. 118, p. 1-23, jan./mar. 2023.
- TEIXEIRA, U. T.. **Políticas Públicas em Transformação.** Apresentação em painel no XVII Congresso Brasileiro da Educação Superior Particular (CBESP), Touros, RN, 28 de maio de 2025.